

Hearing Date: July 29, 2020 at 9:30 a.m. (ET)/ 9:30 a.m. (AST)
Objection Deadline: April 6, 2020 at 4:00 p.m. (ET)/ 4:00 p.m. (AST)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**THIRD INTERIM FEE APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A.,
AS SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES
FOR PERIOD FROM OCTOBER 1, 2020 THROUGH JANUARY 31, 2020**

SUMMARY COVER SHEET

Name of applicant:	Genovese Joblove & Battista, P.A. (“ <u>GJB</u> ”)
Authorized to provide professional services to:	Special Litigation Counsel for the Official Committee of Unsecured Creditors (the “ <u>Committee</u> ”) ²

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

Name of Client:	Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA)
Petition Date:	May 3, 2017
Date of retention:	May 31, 2019, effective as of April 16, 2019 [Docket No. 7181]
Period for which compensation and reimbursement are sought:	October 1, 2019 through and including January 31, 2020 (the “ <u>Application Period</u> ”)
Amount of interim compensation sought as actual, reasonable, and necessary:	\$1,195,830.20 ³
Amount of interim expense reimbursement sought as actual, reasonable, and necessary:	\$33,296.95
Are your fee or expense totals different from the sum of previously-served monthly statements for the Application Period?	No.
Total compensation approved by interim order to date:	\$657,907.05 (First Interim Fee Order ECF No. 9046) ⁴
Total expenses approved by interim order to date:	\$3,848.56 (First Interim Fee Order ECF No. 9046)
Total allowed compensation paid to date:	\$2,172,300.69
Total allowed expenses paid to date:	\$61,671.20
Blended rate in this Application for all attorneys:	(a) \$515.07/hour ⁵
Blended rate in this Application for all timekeepers:	(a) \$438.60/hour
Total compensation sought in this Application already paid pursuant to a monthly compensation order but not yet allowed:	\$429,817.22

³ The full amount of fees incurred by GJB during the Application Period total \$1,494,787.75. GJB agreed taking a voluntary fee reduction equal to 20% in the amount of \$298,957.55 and, thereby, seeks allowance and payment of fees in the amount of \$1,195,830.20. By the time of the hearing on this Application, a portion of this amount should have been paid by the Debtors pursuant to the Interim Compensation Order, and GJB reserves its rights to seek relief from the Court to the extent any outstanding fees and expenses that are due and payable are not paid on the terms set forth in the Interim Compensation Order.

⁴ The Second Interim Fee Application has not yet been approved by the Court, the hearing was continued to April 22, 2020 at 9:30 a.m.

⁵ The calculation of the blended hourly rates reflected in this Application Period does not take into account GJB’s agreement to reduce its fees by an amount equal to 20% of its hourly rates.

Total expenses sought in this Application already paid pursuant to a monthly compensation order but not yet allowed.	\$7,695.88
Total time expended for fee application preparation during the Application Period:	None.
Total compensation requested for fee application preparation during the Application Period:	None.
Number of professionals included in this Application:	19
If applicable, number of professionals in this Application not included in a staffing plan approved by the client:	N/A
If applicable, difference between fees budgeted and compensation sought for the Application Period:	\$414,955.94
Number of professionals billing fewer than 15 hours to the case during the Application Period:	3
Are any timekeeper's hourly rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this Application using the rates originally disclosed in the retention application:	None.

SUMMARY OF PRIOR MONTHLY FEE STATEMENTS FOR THE COMPENSATION PERIOD FROM APRIL 16, 2019 THROUGH JANUARY 31, 2020

Date	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested	Fees Paid	Expenses Paid
July 9, 2019	April 19, 2019- April 30, 2019	\$386,294.25	\$309,035.40	\$278,131.86	\$30,903.54	\$2,539.46	\$278,131.86	\$2,539.46
July 15, 2019	May 1, 2019- May 31, 2019	\$305,448.00	\$244,358.40	\$219,922.56	\$24,435.84	\$7,833.59	\$219,922.56	\$7,833.59
August 27, 2019	June 1, 2019-June 30, 2019	\$382,072.25	\$305,657.78	\$275,092.02	\$30,565.73	\$1,389.18	\$270,305.31	\$1,389.18
September 27, 2019	July 1, 2019- July 31, 2019	\$407,887.50	\$326,310.00	\$293,679.00	\$32,631.00	\$24,948.34	\$287,622.20	\$24,948.34
November 5, 2019	August 1, 2019- August 30, 2019	\$385,731.00	\$308,584.80	\$277,726.32	\$30,858.48	\$15,291.51	\$273,560.43	\$15,291.51
November 14, 2019	September 1, 2019 – September 30, 2019	\$553,257.25	\$442,605.80	\$398,345.22	\$44,260.58	\$1,973.24	\$392,370.04	\$1,973.24
January 10, 2020	October 1, 2019- October 31, 2019	\$606,059.25	\$484,847.40	\$436,362.66	\$48,484.74	\$7,695.88	\$429,817.22	\$7,695.88
March 2, 2020	November 1, 2019- November 30, 2019	\$418,140.50	\$334,512.40	\$301,061.16	\$33,451.24	\$7,321.13	N/A	N/A
March 2, 2020	December 1, 2019- December 31, 2019	\$263,706.75	\$210,965.54	\$189,868.86	\$21,096.68	\$9,617.26	N/A	N/A
March 12, 2020 ⁶	January 1, 2020- January 31, 2020	\$206,881.25	\$165,505.00	\$148,954.50	\$16,550.50	\$8,662.68	N/A	N/A

⁶ The January 31, 2020 invoices were submitted to the Committee for review and approval but as of the deadline for

Summary of Amounts Requested to be Paid

Total Unpaid Fees: \$639,884.52

Total Unpaid Expenses \$25,601.07

Total 10% Holdback on Fees: \$119,583.02

Reimbursement for 29% Tax Withholding: N/A

Reimbursement for 1.5% Government Contribution: \$6,545.44

Less expenses voluntarily reduced herein: N/A

Total Amount Requested to be Paid in Fees and Expenses for this period: \$672,031.03

filing of this application had not yet been approved. In the event that the fees and expenses set forth herein for the month of January 2020 are not approved in total, then GJB will file a supplemental Application accordingly.

PRIOR INTERIM FEE APPLICATIONS

First Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
7/15/19	7994	April 19, 2019- May 31, 2019	\$691,742.25	\$553,393.80	\$498,054.42	\$55,339.38	\$10,373.05

Second Interim Fee Application

Date Filed	DE#	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
11/15/19	9213	June 1, 2019- September 30, 2019	\$1,728,948.00	\$1,383,158.40	\$1,244,842.56	\$138,315.84	\$43,602.27

SUPPORTING CERTIFICATION, EXHIBITS, AND SCHEDULES

In accordance with the U.S. Trustee Guidelines, at the end of this Application are the following Exhibits and Schedules:

EXHIBIT A	CERTIFICATION OF JOHN H. GENOVESE IN SUPPORT OF APPLICATION
EXHIBIT B	CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES
EXHIBIT C	SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION
EXHIBIT D	BUDGETS AND STAFFING PLANS FOR APPLICATION PERIOD
EXHIBIT E	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY
EXHIBIT E-1	SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY AS COMPARED TO BUDGET
EXHIBIT E-2	SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY
EXHIBIT F	BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT REQUESTED AND BY WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE PUERTO RICO
SCHEDULE 1	LIST OF PROFESSIONALS BY MATTER
SCHEDULE 2	MONTHLY STATEMENTS COVERED IN APPLICATION
SCHEDULE 3	PROPOSED ORDER

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.⁷

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**THIRD INTERIM APPLICATION OF GENOVESE JOBLOVE & BATTISTA, P.A,
SPECIAL LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR PERIOD FROM OCTOBER 1, 2019 THROUGH JANUARY 1, 2020**

To The Honorable United States District Judge Laura Taylor Swain:

Genovese Joblove & Battista, P.A. (“GJB”), special litigation counsel to the Official Committee of Unsecured Creditors (the “Committee”),⁸ in the above-captioned Title III cases (the “Title III Cases”) hereby submits its third interim fee application (the “Application”) for allowance

⁷ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

⁸ Prior to August 25, 2017, the Committee was the Official Committee of Unsecured Creditors for the Commonwealth’s Title III case only. On August 25, 2017, the U.S. Trustee expanded the Committee’s role to also include the Title III cases of HTA, ERS, and PREPA.

of compensation for professional services rendered, and reimbursement for actual and necessary expenses incurred in connection with such services, for the period from October 1, 2019 through January 31, 2020 (the “Application Period”). GJB submits this Application pursuant to sections 316 and 317 of the Puerto Rico Oversight, Management and Economic Stability Act of 2016 (“PROMESA”),⁹ section 503(b) of Title 11, United States Code (the “Bankruptcy Code”) as made applicable to these cases by section 301(a) of PROMESA, Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Local Bankruptcy Rules for the United States Bankruptcy Court for the District of Puerto Rico (the “Local Rules”), *Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* issued by the Executive Office for the United States Trustee, 28 CFR Part 58, Appendix B (the “Guidelines”), and in accordance with this Court’s the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Interim Compensation Order”) [Docket No. 1715]; the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (“Second Interim Compensation Order”) [Docket No. 3269]; the Fee Examiner’s November 10, 2017 Memorandum (the “Fee Examiner Memorandum”); the Court’s *Order on Fee Examiner’s Motion to Impose Presumptive Standards and Timeliness requirements for Professional Fee Applications* (the “Presumptive Order”) [Docket No. 3932]; and the Court’s *Order Imposing Additional Presumptive Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-retained Professionals* (the “Revised Presumptive Order”) [Docket No. 7678]. In support of the Application, GJB submits the Certification of John H. Genovese (the “Genovese Certification”), attached hereto as **Exhibit A**, and respectfully represents as follows:

⁹ References to PROMESA are references to 48 U.S.C. §§ 2101 *et. seq.*

Jurisdiction and Venue

1. The Court has subject matter jurisdiction to consider and determine this Third Interim Application pursuant to PROMESA section 306(a). Venue is proper before this Court pursuant to PROMESA section 307(a). The statutory predicates for the relief requested herein are PROMESA sections 316 and 317, Bankruptcy Rule 2016 and Local Rule 2016-1.

2. This Application has been prepared in accordance with the Guidelines and the Interim Compensation Order. Attached hereto as **Exhibit A** is a certification regarding compliance with the Local Guidelines.

3. This Application is consistent with the Interim Compensation Order (as defined below), Local Rule 2016-1, and *Appendix B of the United States Trustee's Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases* (the "U.S. Trustee Guidelines"). To the extent necessary, GJB requests a waiver for cause shown of any requirements not met by this Application.¹⁰

BACKGROUND

A. Case Background

4. On May 3, 2017, the Oversight Board commenced a Title III case for the Commonwealth of Puerto Rico by filing a voluntary petition for relief pursuant to section 304(a) of PROMESA (the "Commonwealth Title III Case"). Thereafter, the Oversight Board commenced a Title III case for each of COFINA, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (the "ERS Title III Case"), the Puerto Rico Highways and

¹⁰ The Committee and GJB reserve all rights as to the relevance and substantive legal effect of the U.S. Trustee Guidelines with respect to any application for compensation in these cases.

Transportation Authority (the “HTA Title III Case”), and the Puerto Rico Electric Power Authority (the “PREPA Title III Case”) (and together with the Commonwealth Title III Case, the “Title III Cases”).¹¹ By orders dated June 29, 2017 [Docket No. 537] and October 6, 2017 [Docket No. 1417], the Court approved the joint administration of the Title III Cases.

5. On June 15, 2017, the Office of the United States Trustee for the District of Puerto Rico (the “U.S. Trustee”) filed a *Notice Appointing Creditors Committee for Unsecured Creditors* [Docket No. 338]. Thereafter, on the U.S. Trustee modified the composition of the Committee membership [Docket Nos. 1171, 3058, and 3947], such that, currently, the members of the Committee are the American Federation of Teachers, Baxter Sales and Distribution Puerto Rico Corp., Doral Financial Corporation, Genesis Security Services, Inc., Service Employees International Union, Tradewinds Energy Barceloneta, LLC, and Unitech Engineering Group, S.E. (the “Committee Members”) [Docket No. 3947].

6. On August 25, 2017, the U.S. Trustee filed an *Amended Notice of Appointment of Official Committee of Unsecured Creditors* [Docket No. 1171], which expanded the role of the Committee to be the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case.

B. Retention of Genovese Joblove & Battista, P.A.

7. On April 16, 2019, the Committee selected GJB as proposed special litigation counsel to the Committee in connection with the evaluation and analysis of potential causes of action and representation as co-plaintiff in the filing and prosecution of certain claims and causes of action to be asserted against certain parties involved in the offering of (a) the Commonwealth’s General Obligation bonds (“GO Bonds”), (b) bonds issued by the Public Buildings Authority

¹¹ Unless otherwise indicated, references to docket numbers shall be to the docket of the Commonwealth Title III Case.

(“PBA”), and (c) bonds issued by ERS (“ERS”), including bond counsel, disclosure counsel, underwriters, underwriters’ counsel, swap counterparties, or auditors (collectively, the “Financial Party Targets”).

8. Upon its retention on April 16, 2019, and prior to entry of the *Stipulation and Agreed Order By and Among Financial Oversight and Management Board, Its Special Claims Committee, and Official Committee of Unsecured Creditors to Joint Prosecution of Debtor Causes of Action* [Doc No. 6524] (the “Joint Prosecution Stipulation”), GJB immediately started assisting the Committee with respect to the Committee’s motion to pursue certain causes of action on behalf of the Commonwealth, filed with the court on April 17, 2019 [Docket No. 6325] (the “926 Motion”), including the reply in further support of the 926 Motion, filed with the court on April 22, 2019 [Docket No. 6458]. Additionally, GJB evaluated and analyzed certain potential causes of actions against the Financial Party Targets in order to file the Co-Plaintiff Adversary Proceedings against such Financial Party Targets on or before the Commonwealth’s statute of limitation deadline or after expiration or termination of the Tolling Agreements with respect to such Financial Party Targets. These tasks required a great deal of work in a very short period of time due to the impending statute of limitations deadline of May 2, 2019.

9. The retention of a special litigation counsel was necessary and appropriate because the Committee’s primary counsel, Paul Hastings, LLP (“Paul Hastings”) represents certain of the Financial Party Targets (or their affiliates) in matters unrelated to the Title III Cases.

10. On April 26, 2019, the Court approved the Joint Prosecution Stipulation. In connection with the prosecution of such claims or causes of action, the Oversight Board agreed to the appointment of the members of the Special Claims Committee of the Oversight Board

(“Special Claims Committee”), on the one hand, and the Committee, on the other hand, as co-trustees and co-plaintiffs with respect to the Co-Plaintiff Adversary Proceedings.

11. As set forth in the Engagement Agreement dated April 30, 2019, GJB was retained by and authorized to represent the Committee as special litigation counsel and assist the Committee and the Special Claims Committee regarding investigation and pursuit of potential claims against certain Financial Party Targets.

12. On April 30, 2019, the Committee filed the *Application for Order Pursuant to Bankruptcy Code Section 1103(a) and Local Bankruptcy Rule 2014-1(e) Authorizing Employment and Retention of Genovese Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Effective as of April 16, 2019* [Docket No. 6661] (the “GJB Employment Application”).

13. On May 31, 2019, the Court entered the *Order Authorizing Employment and Retention of Genovese, Joblove & Battista, P.A. as Special Litigation Counsel to Official Committee of Unsecured Creditors, Pursuant to Bankruptcy Code Section 1103(A) and Local Rule 2014-1(e), Effective as of April 16, 2019* [Docket No. 7181] (the “Retention Order”).

14. GJB’s retention extends to the representation of the Committee as the official committee for the HTA Title III Case, the ERS Title III Case, and the PREPA Title III Case. In particular, the Retention Order provided that “[t]he retention of GJB, as counsel to the Committee, shall be deemed to apply to the representation of the Committee if ever enlarged to include unsecured creditors of other debtors, without the need to obtain a modification of this Order.”

15. The Retention Order authorized GJB to be compensated on an hourly basis and reimbursed for actual and necessary out-of-pocket expenses pursuant to sections 316 and 317 of PROMESA, the Bankruptcy Rules, the Local Rules, and such orders as the Court may direct. The

Retention Order further provides that “[p]ursuant to Bankruptcy Code section 503(b)(1), made applicable by PROMESA section 301(a), the fees and expenses of GJB shall be an administrative expense.” In addition, as provided in the Retention Order, the Committee has consented to the Debtors’ payment of GJB’s allowed fees and expenses.

C. Interim Compensation and Fee Examiner Orders

16. On August 23, 2017, the Court entered the *Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1150].

17. On October 6, 2017, the Court appointed a Fee Examiner in these Title III Cases (the “Fee Examiner”) pursuant to the *Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(a) Appointing a Fee Examiner and Related Relief* [Docket No. 1416] (the “Fee Examiner Order”). The Court appointed Brady Williamson as the Fee Examiner in the Title III Cases.

18. On October 31, 2017, the Fee Examiner filed the *Urgent Motion of the Fee Examiner to Amend the Interim Compensation Order, Including the Due Date and Hearing Date for Interim Compensation* [Docket No. 1594].

19. On November 8, 2017, the Court entered the *First Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 1715].

20. On November 10, 2017, the Fee Examiner issued a memorandum, and on January 3, 2018, the Fee Examiner issued a supplemental memorandum (together, the “Fee Examiner Guidelines”) to all retained professionals in these Title III Cases providing additional guidelines in connection with the Interim Compensation Order.

21. On May 8, 2018, the Fee Examiner filed the *Motion of the Fee Examiner to Amend the Fee Examiner Order with Respect to the Scope of the Fee Examiner's Authority in the Interest of Administrative Efficiency* [Docket No. 3032] (the "Motion to Amend the Fee Examiner Order").

22. On May 23, 2018, the Oversight Board and the Puerto Rico Fiscal Agency and Financial Authority ("AAFAF") filed a *Joint Motion for Entry of an Order Further Amending the Interim Compensation Order* [Docket No. 3133].

23. On June 6, 2018, the Court entered the Interim Compensation Order [Doc. No. 3269], and in accordance therewith, GJB and other professionals retained in these Title III Cases were authorized to serve upon the parties identified therein (the "Notice Parties") monthly fee statements (the "Monthly Fee Statements").

24. Pursuant to the Interim Compensation Order, the Notice Parties have ten (10) days from the date of service of the Monthly Fee Statement to object to the amounts requested. If no objection is filed prior to expiration of the objection period, the Commonwealth is authorized to pay the respective professionals 90% of the fees and 100% of the expenses sought in each Monthly Fee Statement.

25. On June 20, 2018, the Court entered the *First Amended Order Pursuant to PROMESA Sections 316 and 317 and Bankruptcy Code Section 105(A) Appointing a Fee Examiner and Related Relief* [Docket No. 3324] (the "Amended Fee Examiner Order").

26. On June 26, 2019, the Court entered the *Order Imposing Additional Standards: Rate Increases and the Retention of Expert Witnesses or Other Sub-Retained Professionals* [Docket No. 7678].

D. Applications for Interim Compensation

27. In addition to the Monthly Fee Statements, the Interim Compensation Order directed professionals to seek interim allowance and payment of compensation (including the 10% held back from Monthly Fee Statements) and expense reimbursement at 120-day intervals (each an “Interim Fee Period”) by filing with the Court and serving on the Notice Parties an application for approval and allowance of all compensation and reimbursement of expenses relating to services rendered and expenses incurred during the preceding Interim Fee Period (*see* Interim Compensation Order at ¶2(f)).

28. On July 15, 2019, GJB filed its First Interim Fee Application for the period from April 16, 2019 through May 31, 2019 [ECF No. 7994] (the “First Interim Fee Application”). The hearing on the First Interim Fee Application was held on October 30, 2019 at 9:30 a.m.

29. On October 29, 2019, the Court entered the *Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Sixth Compensation Period from February 1, 2019 through May 31, 2019* [ECF No. 9046] (the “First Interim Fee Order”). Pursuant to the First Interim Fee Order, GJB was awarded \$657,907.05 in fees and \$3,848.56 in expenses.

30. On November 15, 2019, GJB filed its Second Interim Fee Application for the period from June 1, 2019 through September 30, 2019 [ECF No. 9213] (the “Second Interim Fee Application”). The hearing on the First Interim Fee Application was held on March 4, 2020 at 9:30 a.m. and has been continued to April 22, 2020 at 9:30 a.m.

COMPENSATION AND REIMBURSEMENT REQUEST

31. By this Application, GJB seeks an order authorizing (a) allowance of interim compensation for professional services rendered to the Committee during the Application Period in the aggregate amount of \$1,234,583.00 and (b) allowance of reimbursement of actual and

necessary expenses incurred by GJB in the aggregate amount of \$33,296.95. These amounts were for legal services provided to the Committee in connection with the Commonwealth Title III case.

32. During the Application Period, GJB attorneys and paraprofessionals expended a total of 3,523.05 hours for which compensation is requested. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Committee.

33. The Committee has approved the amounts requested by GJB for services performed and expenses incurred in each of the monthly statements submitted to the Notice Parties as outlined in the Interim Compensation Order with the exception of the January 2020 Fee Statements which are under review.

34. During the Application Period, GJB submitted four (4) Monthly Fee Statements. The first Monthly Fee Statement for the period from October 1, 2019 through October 31, 2019 was submitted and served on the Notice Parties on January 10, 2020 (the “First Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the First Monthly Fee Statement was January 20, 2020.

35. A second Monthly Fee Statement for the period from November 1, 2019 through November 30, 2019 was submitted and served on the Notice Parties on March 2, 2020 (the “Second Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the Second Monthly Fee Statement was March 12, 2020.

36. A third Monthly Fee Statement for the period from December 1, 2019 through December 31, 2019 was submitted and served on the Notice Parties on March 2, 2020 (the “Third Monthly Fee Statement”) a copy of which is attached hereto as Schedule 2. The objection deadline for the Third Monthly Fee Statement is March 12, 2020.

37. A fourth Monthly Fee Statement for the period from January 1, 2020 through January 31, 2020 (the “Fourth Monthly Fee Statement”), was submitted to the Committee, on March 12, 2020, for review and approval but as of the deadline for filing this application had not yet been approved. Therefore, the Fourth Monthly Fee Statement has not been submitted to the Notice Parties pending approval by the Committee.

38. As of the date of the filing of this Application, GJB has received neither payment nor promises of payment from any source for services rendered during the Application Period. The amount of \$672,031.03 remains unpaid.

39. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period GJB voluntarily applied a 20% discount of its hourly rates totaling \$298,957.55. For details regarding the waived fees, please see the Certification of John H. Genovese filed concurrently herewith.

40. By this Application, GJB requests allowance of all fees and expenses incurred for services rendered during the Application Period. At this time, GJB seeks payment of (a) 100% of its fees for services invoiced during the Application Period and (b) 100% of expenses invoiced during the Application Period. The time billed by these timekeepers was reasonable, and GJB reserves the right to seek allowance and payment of these fees based on the facts and circumstances of these cases, including, without limitation, if objections are interposed to the allowance or payment of GJB’s fees and expenses.

41. There is no agreement or understanding between GJB and any other person other than the attorneys, employees, and staff of GJB, for the sharing of compensation to be received for services rendered in these cases.

42. GJB maintains computerized records, in the form of monthly statements, of the time

spent by all GJB's attorneys and paraprofessionals in connection with its representation of the Committee. The monthly statements are in the same form regularly used by GJB to bill its clients for services rendered and include the date that the services were rendered, a detailed, contemporaneous narrative description of the services provided, the amount of time spent for each service, and the designation of the professional who performed the service.

43. The fees charged by GJB in the Title III Case are billed in accordance with its existing billing rates and procedures in effect during the Application Period. The rates GJB charges for the services rendered by its professionals and paraprofessionals in the Title III Case are comparable to the rates GJB charges for professional and paraprofessional services rendered in comparable non-bankruptcy related matters.

44. GJB's rates are set at a level designed to fairly compensate GJB for the work of its attorneys and paraprofessionals to cover fixed and routine overhead expenses. GJB operates in a national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, his or her area of specialization, the firm's expertise, performance and reputation, the nature of the work involved, and other factors. Accordingly, GJB set its rates for attorneys and paraprofessionals both in the restructuring group and other practice groups within the firm by reference to market information and market adjustments by firms considered to be industry peers. Based on this and reviews of contemporaneous time records and fee applications filed in other cases, GJB's endeavors to set the hourly rates for its attorneys and paraprofessionals at levels comparable to those of its principal competitor firms.

45. As is customary, and as permitted pursuant to paragraph 2 of the Retention Order, every year GJB reviews its rate structure and, when appropriate, adjusts its hourly rates based upon (i) the advancing seniority of its professionals and paraprofessionals, (ii) the current market

for legal services, (iii) the rates charged for comparable non-bankruptcy services, and (iv) the firm's analysis of the hourly rates being charged by professionals in other law firms.

46. GJB's professional services during the Application Period required an aggregate expenditure of 3,408.05 recorded hours by GJB's attorneys and paraprofessionals, broken down as follows: partners (1,598.70 hours), associates (1,022.40 hours), and paraprofessionals (786.95 hours). During the Application Period, GJB's billing rates for attorneys rendering services in this matter ranged from \$300.00 to \$765.00 per hour. No rate increases were made in January 2020 for the incoming year.

47. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Application Period, but were not processed before the preparation of this Application, or GJB has for any other reason not sought compensation or reimbursement with respect to such services or expenses, GJB reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future application.

48. Pursuant to, and consistent with, the relevant requirements of the Guidelines, as applicable, the following exhibits are attached hereto and incorporated herein by reference:

- Exhibit A- Certification of John H. Genovese
- Exhibit B- contains disclosures regarding "customary and comparable compensation."
- Exhibit C contains a summary of GJB's timekeepers included in this Application.
- Exhibit D contains the budgets for GJB's services during the Application Period.
- Exhibit E contains (a) a summary of the compensation requested as compared to the compensation budgeted for the firm's services

during the Application Period, and (b) a further breakdown of the compensation requested by project category and matter number.

- Exhibit E-1 contains summary of compensation requested by project category as compared to budget.
- Exhibit E-2 contains a summary of the expense reimbursements requested by category. An itemized schedule of all such expenses is included in GJB's monthly statements.
- Exhibit F contains a breakdown of compensation and expense reimbursement requested by Debtors and by whether the services were rendered in Puerto Rico or outside Puerto Rico.
- Schedule 1 contains a list of the professionals providing Services during the Application Period by matter.
- Schedule 2 includes the monthly fee statements covered in this Application.
- Schedule 3 includes the proposed order approving this Application.

SUMMARY OF SERVICES PERFORMED BY GJB DURING THE APPLICATION PERIOD

49. This Application is GJB's third interim compensation in the Debtors Title III Cases. As with the prior fee period, during this Application Period, GJB has assisted and advised the Committee on a regular basis regarding legal matters related to the Co-Plaintiff Adversary Proceedings. GJB has continued to track deadlines, organized documents, and review the Title III Case dockets to maintain its litigation tracking spreadsheets current. In addition, GJB has reviewed various motions, applications, scheduling orders and other pleadings submitted to the Court in connection with the pending Co-Plaintiff Adversary Proceedings. Specifically, GJB has continued to monitor the progress of a number of adversary proceedings, and advise the Committee as appropriate, including without limitation, those adversary proceedings against underwriters and other financial target parties involved in the issuance of Commonwealth bonds and claims of

PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers. Also, GJB has continued its representation of the Committee with respect to limited “garden-variety” avoidance actions against entities that received preferential and fraudulent transfers before the petition date. Furthermore, GJB has been involved in the representation of the Committee in a subset of adversary proceedings seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued. GJB has continued working on the adversary proceedings challenging liens asserted by certain holders of HTA bonds. GJB also continued its representation of the Committee in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds and ultra vires objection. Lastly, during this Application Period, GJB provided counsel and assistance with other issues related to the Committee’s motion to participate in the GO Bond Claim Objections (and related mediation process) and the impact of PREPA’s restructuring support agreement (the “PREPA RSA Motion”). Additionally, GJB has monitored and reviewed the proposed plan of adjustment [Docket No. 8765] (the “Initial Plan”) and Disclosure Statement [Docket No. 8766] (the “Disclosure Statement”) filed on September 27, 2019 to consider its impact on pending litigation.

50. Set forth below is a description of the professional services rendered by GJB during the Application Period broken down by project category. The following services described are not intended to be a comprehensive summary of the work performed by GJB. Detailed descriptions of all services rendered by GJB can be found in the detailed time records reflecting the services performed by GJB’s professionals, the time expended by each professional, and the hourly rate of each professional, annexed to the Monthly Fee Statements attached hereto as Schedule 2 and such descriptions are incorporated herein by reference.

51. As special litigation and conflicts counsel to the Committee, GJB has jointly worked on various matters with counsel for the Oversight Board or its Special Claims Committee and has made a concerted effort to perform these services in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved while being mindful to avoid any unnecessary or unreasonable duplication of effort with respect to any incurrence of fees in connection with the adversary proceedings commenced under the Joint Prosecution Stipulation. As such, GJB has carefully reviewed its staffing needs on a monthly basis and taken affirmative steps to avoid charges for duplicative services. For example, the work performed by GJB was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Moreover, whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. In addition, a small group of the same GJB attorneys was utilized for the vast majority of the work in these Title III cases to minimize the costs of intra-GJB communication and education about the cases. Notably, as a general matter, no more than two GJB attorneys attended the various hearings held during the Application Period, thereby minimizing not only the time billed on these hearings but also the cost of travel and lodging.

52. Furthermore, to the extent appropriate, GJB sought to work closely with Paul Hastings as counsel for the Committee and Brown Rudnick LLP ("Brown Rudnick" or "Special Claims Committee Counsel") as counsel for the Financial Oversight and Management Board, acting through its Special Claims Committee (the "Oversight Board") in order to eliminate unnecessary duplication and allocate tasks in an efficient manner. In order to minimize duplication, GJB continues to meet with and confer with Special Claims Committee Counsel to discuss pending and potential claims and discuss a division of labor and tasks to limit duplication.

53. In sum, GJB respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the Committee, and were rendered to protect, preserve, and maximize the value for unsecured creditors during the pendency of these Title III cases. Accordingly, in light of the nature and complexity of these Title III cases, GJB's charges for professional services performed and expenses incurred are reasonable under applicable standards. For all these reasons, GJB respectfully requests that the Court grant the Application and allow interim compensation for professional services performed and reimbursement for expenses as requested.

54. For ease of reference and transparency purposes, GJB created several matter numbers for its representation of the Committee. The matter numbers are divided as follows:

Matter ID	Matter Name
001	Official Committee of Unsecured Creditors
002	PREPA Adversary Litigation
003	ERS Adversary Litigation
004	HTA Adversary Litigation
005	Kobre & Kim Report Database Doc. Review

Official Committee of Unsecured Creditors of Commonwealth of Puerto Rico (Matter ID 001)

(a) Case Administration (Task Code B110)

Fees: \$14,480.00 Total Hours: 38.80

55. During the Application Period, GJB reviewed and developed general case strategy and planning of litigation matters, attended to case management, and participated in meetings with Paul Hastings and Brown Rudnick. In order to efficiently track deadlines, organize documents, and manage work streams, GJB created a task list and tracking chart for all adversary proceedings filed which it routinely updates to keep track of deadlines. In addition, during the Application Period, GJB held internal team conference calls and occasional meetings to discuss interim and

long-term strategies regarding the Co-Plaintiff Adversary Proceedings and to manage the work assignments and deadlines, while ensuring efficiencies and avoiding duplication and unnecessary overlap.

- (b) Pleadings Review (Task Code B113)
Fees: \$85,407.00 Total Hours: 437.40

56. During the Application Period, GJB periodically monitored the docket and reviewed and analyzed pleadings and filings in the Title III cases pertaining to those matters that impacted the Co-Plaintiff Adversary Proceedings and prepared summaries of pleadings filed and orders entered for internal review. Further, GJB reviewed relevant pleadings filed related to the Co-Plaintiff Adversary Proceedings it is handling as special litigation counsel to the Committee.

- (c) Meeting of Creditors (Task Code B150)
Fees: \$13,650.00 Total Hours: 24.30

57. During the Application Period, GJB attended telephone conferences, and weekly meetings, and other communications with the Committee, including preparation for such calls and meetings in order to maintain the Committee informed of the various developments in the Co-Plaintiff proceedings being handled by GJB.

- (d) Court Hearings (Task Code B155)
Fees: \$3,220.00 Total Hours: 5.60

58. During the Application Period, GJB attorneys prepared for and attended in San Juan (i) the October 30, 2019 Omnibus Hearings; (b) the December 11, 2019 Omnibus Hearing in connection with the Mediation Team's Interim report; and (c) the January 29, 2020 omnibus hearing in connection with the status conference related to the issues concerning the PREPA RSA and renewed motion for ADR procedures. This task code also includes time spent preparing for such hearings.

(e) Fee/Employment Applications (GJB) (Task Code B160)

Fees: \$46,905.50

Total Hours: 105.20

59. During the Application Period, GJB prepared four (4) monthly fee statements for services rendered during the months of October, November, December, 2019 and January 2020 as well as responding to inquiries from the Fee Examiner. GJB also prepared and filed the Second Interim Fee Application and related exhibits [Doc No. 9213].

(f) Budgeting (Task Code B161)

Fees: \$16,089.00

Total Hours: 26.50

60. During the Application Period, GJB reviewed Budget and staffing issues and procedures in connection with the preparation, submission and approval of same. GJB prepared monthly budgets for October, November, December, 2019 and January, 2020, as required by the Fee Examiner and Interim Fee Orders.

(g) Fee/Employment Applications for Other Professionals (Task Code B165)

Fees: \$898.50

Total Hours: 1.80

61. During the Application Period, GJB reviewed fee and retention applications of other professionals in the Title III Cases as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel such as Jose F. Cartaya- Morales regarding invoices rendered as local conflicts litigation Co-Counsel; or (ii) where matters principally handled by GJB are implicated.

(h) Avoidance Action Analysis (Task Code B180)

Fees: \$234.00

Total Hours: 11.20

62. During the Application Period GJB performed services with respect to the “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279] against entities that received preferential and fraudulent transfers before the petition date.

(i) Preference Analysis and Recovery Actions (Task Code B181)

Fees: \$214.50 Total Hours: 1.10

63. During the Application Period, GJB conferred with Paul Hastings and the Committee regarding litigation strategy and legal research on certain potential preference and recovery actions.

(j) Other Contested Matters (Task Code B190)

Fees: \$5,205.00 Total Hours: 10.40

64. During the Application Period, GJB's analyzed contested matters in Title III Cases in which Paul Hastings had a conflict with. GJB reviewed and analyzed potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that were potentially adverse to the Committee including main case issues as claims objections and plan of adjustment.

(k) General Litigation (Task Code B191)

Fees: \$815,114.25 Total Hours: 1,687.05

65. During this Application Period, GJB has continued its representation as special litigation and conflicts counsel to the Committee in connection with various adversary proceedings, including without limitation, two (2) separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280-LTS]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS]. In connection with the foregoing, GJB has been working with Committee and Special Claims Committee counsel and monitoring the establishment and extension of Case Management Procedures and Approval of Settlements related to those litigation matters it is handling. GJB has

also provided, from time-to-time, additional assistance to Committee counsel with respect to litigation matters within GJB's subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters. Furthermore, GJB has been involved in the representation of the Committee in a subset of adversary proceedings seeking to recover, among other things, declaratory judgments that the pertinent challenged GO bonds were issued in violation of the Constitution of Puerto Rico and to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, and Adv. Proc. No. 19-288] and a proceeding challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-364]. GJB also continued its representation of the Committee in connection with the ERS litigation which is seeking, among other things, declarations on the scope of the liens purportedly securing the ERS bonds Adv. Proc. No. 19-367 and *ultra vires* objection.

(l) Non-Working Travel (Task Code B195)

Fees: \$2,846.25 Total Hours: 9.90

66. During the Application Period, one GJB professional traveled to and from San Juan, PR to attend the omnibus hearing held on October 30, 2019, December 11, 2019, and January 29, 2020. In addition, one GJB professional attend by phone the hearing on ERS-related discovery matters held on January 15, 2020. In accordance with Local Rule 2016-2(d)(viii), GJB billed for one-half the total time that GJB professionals spent on non-working travel.

(m) Debtors' Fiscal Plan (Task Code B210)

Fees: \$172.50 Total Hours: 0.30

67. During the Application Period, GJB reviewed and analyzed the Debtors' fiscal plan and related matters solely in limited instances where GJB may need to familiarize itself with

matters that may impact on the pending Co-Plaintiff Adversary Proceedings.

(n) Plan and Disclosure Statement (Task Code B320)

Fees: \$14,138.00 Total Hours: 26.80

68. During this Application Period, GJB provided assistance with issues related to the Initial Plan and Disclosure Statement filed on September 28, 2019 and its impact on the pending Co-Plaintiff Adversary litigation.

(o) Restructurings (Task Code B420)

Fees: \$345.00 Total Hours: 0.60

69. During this Application Period, GJB reviewed Supreme Court decision denying petitions for certiorari filed by Assured and Ambac and overall impact on the pending Co-Plaintiff Adversary litigation.

V. PREPA (Matter ID 002)

(a) Case Administration (Task Code B110)

Fees: \$2,012.00 Total Hours: 8.00

70. During the Application Period, GJB continued to monitor the case and review pleadings associated with the PREPA RSA Motion, orders, hearings, and objections thereto.

(b) Pleadings Review (Task Code B113)

Fees: \$1,322.50 Total Hours: 2.30

71. During the Application Period, GJB reviewed the various daily filings related to the matters for which it is engaged as well as those pleadings related to PREPA RSA Motion and proposed settlement by the Oversight Board for the restructuring of PREPA.

(c) Meeting of Creditors (Task Code B150)

Fees: \$3,105.00 Total Hours: 5.40

72. During the Application Period, GJB attended telephone conferences, meetings, and

other communications with the Committee, including preparation for such calls and meetings.

- (d) Court Hearings (Task Code B155)
Fees: \$1,380.00 Total Hours: 2.40

73. During the Application Period, GJB attorneys prepared for and attended the omnibus hearing on December 11, 2019 in San Juan, PR. This task code also includes time spent preparing for such hearings

- (e) Fee/Employment Applications (Task Code B160)
Fees: \$1,552.50 Total Hours: 2.70

74. During the Application Period, GJB prepared four (4) monthly fee statements for services rendered during the months of October, November, December, 2019 and January 2020 as well as responding to inquiries from the Fee Examiner. GJB also prepared and filed the Second Interim Fee Application and related exhibits [Doc No. 9213].

- (f) Budgeting (Task Code B161)
Fees: \$230.00 Total Hours: 0.40

75. During the Application Period, GJB revised and submitted the various monthly Budgets to the Committee for review and approval.

- (g) Fee-Employment Other Professionals (Task Code B165)
Fees: \$841.50 Total Hours: 1.10

76. During the Application Period, GJB reviewed fee and retention applications of other professionals in the Title III Cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel such as Jose F. Cartaya- Morales regarding invoices rendered as local conflicts litigation Co-Counsel; or (ii) where matters principally handled by GJB are implicated.

- (h) Other Contested Matters (Task Code B190)
Fees: \$79,982.00 Total Hours: 145.50

77. During the Application Period, GJB assisted with various litigation matters related to the PREPA RSA and PREPA 9019 Motion. In connection with the RSA and 9019 motion one professional from GJB attended via telephone the deposition held on October 7, 2019 of Frederic Chapados; deposition held on October 8, 2019 of David A. Skeel and deposition held on October 16, 2019 of David Brownstein.

(i) General Litigation (Task Code B191)
Fees: \$297,481.00 Total Hours: 642.80

78. During the Application Period, GJB reviewed and analyzed draft litigation and expert materials relating to PREPA RSA and 9019 Motion. GJB also was involved in pursuing the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-388-LTS]. Additionally, GJB was in contact with the SEC and VITOL defendants regarding the above referenced cases. GJB reviewed and analyzed the motion to stay the adversary proceedings and corresponding pleadings.

(j) Non-Working Travel (Task Code B195)
Fees: \$7,618.75 Total Hours: 26.50

79. During the Application Period, GJB attended Committee meetings in San Juan, P.R and New York City.

(k) Meetings of and Communications with Board (Task Code B260)
Fees: \$402.50 Total Hours: 0.70

80. During the Application Period, GJB met and communicated with Debtors, the Oversight Board, and their respective advisors. GJB regularly collaborates with the Special Claims Committee of the FOMB on matters GJB appears as conflicts counsel.

(l) Plan and Disclosure Statement (Task Code B320)
Fees: \$5,117.50 Total Hours: 8.90

81. During the Application Period, GJB spent time reviewing the Plan of Adjustment filed by the Commonwealth and its potential impact on the pending Co-Plaintiff Adversary litigation as it relates to PREPA matters.

V. ERS (Matter ID 003)

(a) Case Administration (Task Code B110)
Fees: \$2,014.50 Total Hours: 10.80

82. During the Application Period, GJB continued its review of pleadings associated to the ERS Title III Case and pending ERS Bond litigation by, among other things, calendaring hearings and deadlines associated with the motion for relief from stay filed by certain ERS bond holders. GJB reviewed agendas for omnibus hearings scheduled on June 12, 2019 and July 24, 2019.

(b) Meeting of Creditors (Task Code B155)
Fees: \$57.50 Total Hours: 0.10

83. During the Application Period, GJB attended telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings.

(c) Fee/Employment Applications (Task Code B129)
Fees: \$287.50 Total Hours: 0.50

84. During the Application Period, GJB reviewed the time entries related to the ERS matters.

(d) Other Contested Matters (Task Code B190)
Fees: \$702.00 Total Hours: 3.60

85. During the Application Period, During the Application Period, GJB reviewed the Motion to Stay ERS Adversary Proceedings and conferred with the GJB Team on its impact on the litigation being handled by GJB. Additionally, GJB reviewed and analyzed ERS bond

avoidance issues; reviewed motions regarding joint consideration of ERS claims; revised and redlined ERS draft complaint; reviewed and analyzed revised ERS bondholder chart; conferred with local counsel, Casillas, Santiago and Torres, regarding ERS complaint; and reviewed order on briefing schedule regarding ERS bonds.

(e) General Litigation (Task Code B191)
Fees: \$75,497.00 Total Hours: 175.50

86. During the Application Period, GJB continued its work representing the Committee in connection with the ERS Bond adversaries [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB represents the Committee with respect to count I of the recovery actions and has been handling the *ultra vires* issues as they relate to count I of the recovery actions and scheduling orders regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues. Additionally, GJB has tracked the Committee's omnibus objection to the claims or ERS bondholders, discovery and summary judgment briefing on the lien scope and *ultra vires* issues with respect to the ERS bonds, as well as lift stay issues to the extent they impact the ERS Bond litigation.

(f) Meetings and Communications with Board (Task Code B260)
Fees: \$287.50 Total Hours: 0.50

87. During the Application Period, GJB met and communicated with Debtors, the Oversight Board, and their respective advisors. GJB regularly collaborates with the Special Claims Committee of the FOMB on matters GJB appears as conflicts counsel.

VI. HTA (Matter ID 004)

(a) Fee/Employment Applications (Task Code B160)
Fees: \$115.00 Total Hours: 0.20

88. During the Application Period, GJB reviewed the monthly invoices for this matter.

(b) General Litigation (Task Code B191)
Fees: \$922.00 Total Hours: 2.00

89. During the Application Period, GJB paralegals prepared, reviewed and analyzed adversary complaints, prepared summons, service and case management orders. GJB reviewed motions for leave of court in various adversary cases and calendared appropriate deadlines.

VI. Kobre & Kim Report Database Doc Review (Matter ID 005)- N/A

90. During the Application Period there was no time billed in this matter.

ATTENDANCE AT HEARINGS

91. In accordance with the presumptions set forth in the *Order on Fee Examiner's Motion to Impose Presumptive Standards and Timeliness Requirements for Professional Fee Applications* [Docket No. 3932] (the "Presumptive Standards Order"), GJB provides the following summary regarding the attendance of GJB's professionals at Court hearings:²⁹

- DECEMBER 11, 2019: John Arrastia attended the December 11, 2019 omnibus hearing in-person to be heard in connection with several contested matters relating to the litigation to be brought by the Oversight Board, Special Claims Committee and Committee as discussed in more detail above.
- JANUARY 28, 2020: John Arrastia attended the January 28, 2020 committee meeting in-person to be heard in connection with several contested matters relating to the pending litigation.

ACTUAL AND NECESSARY DISBURSEMENTS

92. As set forth in Exhibit D-2 hereto, GJB disbursed \$33,296.95 as expenses incurred in providing professional services during the Application Period.

93. The time constraints imposed by the circumstances of the matters handled by GJB during the Application Period required its attorneys and other employees, at times, to devote substantial time during the evenings and on weekends to perform legal services on behalf of the

Committee. These extraordinary services were essential to meet deadlines, timely respond to inquiries on a daily basis, and satisfy the Committee's needs and demands. Attorneys and other GJB employees who worked late in the evenings or on weekends were reimbursed for their reasonable meal and transportation costs in accordance with the Local Rules and firm policy. GJB's regular practice is not to include components for those charges in overhead when establishing billing rates, but rather to charge its clients for these and all other out-of-pocket disbursements incurred during the regular course of the provision of legal services.

94. GJB believes the rates for charges incurred are the market rates that the majority of law firms charge clients for such services. In addition, GJB believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

REQUESTED COMPENSATION SHOULD BE ALLOWED

95. Section 316 of PROMESA provides for the compensation of professionals. Specifically, section 316 provides that a court may award a professional employed by a committee under section 1103 of the Bankruptcy Code "reasonable compensation for actual, necessary services rendered . . . and reimbursement for actual, necessary expenses." PROMESA

§ 316(a). Section 316 also sets forth the criteria for the award of such compensation and reimbursement:

- (a) In determining the amount of reasonable compensation to be awarded to a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including:
 - (i) the time spent on such services;
 - (ii) the rates charged for such services;

- (iii) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this chapter;
- (iv) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (v) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the restructuring field; and
- (vi) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title or title 11, United States Code.

PROMESA § 316(c). Further, section 317 of PROMESA provides that “a committee . . . may apply to the court not more than once every 120 days . . . for such compensation for services rendered”

96. In the instant case, GJB respectfully submits that the services for which it seeks compensation in this Application were, at the time rendered, believed to be necessary for and beneficial to the Committee, the Debtors, and their stakeholders and were rendered to protect, preserve, and maximize value for unsecured creditors during the pendency of the Title III Cases. The services rendered to the Committee were performed in an economic, effective, and efficient manner commensurate with the complexity and importance of the issues involved. The results obtained to date have benefited not only the Committee but also the Debtors, their stakeholders, and other interested parties. Accordingly, the compensation requested herein is reasonable in light of the nature, extent, and value of such services to the Committee, the Debtors, and all parties in interest.

97. The work conducted was carefully assigned to appropriate professionals or paraprofessionals according to the experience and level of expertise required for each particular task. Whenever possible, GJB sought to minimize the costs of GJB's services to the Committee by utilizing talented junior attorneys and paraprofessionals to handle the more routine aspects of the assignments. A small group of the same GJB attorneys was utilized for the vast majority of the work in order to minimize the costs of intra-GJB communication and education about the Title III Cases. As demonstrated by this Application, GJB spent its time economically and without unnecessary duplication. Accordingly, approval of the compensation sought herein is warranted.

NOTICE

98. In accordance with the Interim Compensation Order, GJB will provide notice of this Application to (i) the attorneys for the Oversight Board, Proskauer Rose LLP and O'Neill & Borges LLC; (ii) the attorneys for the Puerto Rico Fiscal Agency and Financial Advisory Authority, O'Melveny & Myers LLP and Marini Pietrantonio Muñiz LLC; (iii) the Office of the United States Trustee for the District of Puerto Rico; (iv) the attorneys for the Official Committee of Retired Employees, Jenner & Block LLP and Bennazar, García & Milián, C.S.P.; (v) the Puerto Rico Department of Treasury; (vi) the Fee Examiner, Brady Williamson; and (vii) counsel to the Fee Examiner, Godfrey & Kahn, S.C. and EDGE Legal Strategies, PSC. In addition, the notice of hearing with respect to this Application will be served on all parties that have filed a notice of appearance in the Title III Cases.

CONCLUSION

WHEREFORE, GJB respectfully requests entry of an order, substantially in the form attached hereto as Schedule 3, (i) allowing interim compensation for professional services rendered during the Application Period in the amount of \$1,195,830.20, representing 100% of the fees billed

during the Application Period (after taking into account the 20% reduction of fees in the amount of \$298,957.55) and reimbursement of \$33,296.95, representing 100% of the actual and necessary expenses incurred during the Application Period (ii) authorizing and directing the Debtors' payment of the fees allowed (net of credits for fee reductions) plus 100% of the expenses allowed and any amounts paid by the Debtors pursuant to the Interim Compensation Order, (iii) allowing such compensation and payment for professional services rendered and reimbursement of actual and necessary expenses incurred be without prejudice to GJB's right to seek such further compensation and/or payment for the full value of services performed and expenses incurred, and (iv) granting GJB such other and further relief as is just.

Dated: March 16, 2020.

/s/ John H. Genovese

GENOVESE JOBLOVE & BATTISTA, P.A.

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**CERTIFICATION OF JOHN H. GENOVESE, ESQ. IN SUPPORT OF THIRD INTERIM
FEE APPLICATION OF GENOVESE JOBLove & BATTISTA, P.A., AS SPECIAL
LITIGATION COUNSEL TO OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, FOR SERVICES RENDERED AND REIMBURSEMENT OF
EXPENSES FOR PERIOD FROM OCTOBER 1, 2019 THROUGH JANUARY 31, 2020**

I, John H. Genovese, certify that the following is true to the best of my knowledge information, and belief:

1. I am an attorney and shareholder of the law firm of Genovese Joblove & Battista, P.A. (“GJB”), with four offices in Florida located at 100 SE 2nd Street, Suite 44th Floor, Miami, FL 33131 (“Miami”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”), Edison Theatre Building, 1533 Hendry Street, Suite 301 Fort Myers, FL 33901 (“Fort Myers”); and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. I am admitted to practice law in the state of Florida. By order dated April 16, 2019, I was admitted to appear *Pro Hac Vice* in the Debtors Title III Cases [Docket No. 6330].

3. I am duly authorized to make this Certification on behalf of GJB. The facts set forth in this Certification are based upon my personal knowledge, my discussions with other GJB attorneys, and the review of GJB's client/matter records by me or other GJB attorneys acting under my supervision and direction.

4. In accordance with (a) Local Bankruptcy Rule 2016-1 (the "Local Guidelines"), (b) Appendix B of the United States Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330, effective as of November 1, 2013 (the "U.S. Trustee Guidelines"), and (c) the *Second Amended Order Setting Procedures for Interim Compensation and Reimbursement of Expenses of Professionals entered June 6, 2018* (the "Interim Compensation Order"), this Certification is made with respect to the *Second Interim Application of Genovese Joblove & Battista, P.A., as Special Litigation Counsel to Official Committee of Unsecured Creditors, for Services Rendered and Reimbursement of Expenses for the Period from October 1, 2019 through January 31, 2020* (the "Application").²

5. Pursuant to section (a)(4) of the Local Guidelines, I hereby certify that I have read the Application and, to the best of my knowledge, information, and belief, formed after reasonable inquiry, (a) the compensation and reimbursement of expenses sought in the Application conforms with the Bankruptcy Code, the Bankruptcy Rules, the U.S. Trustee Guidelines, and the Local Rules, (b) the compensation and reimbursement of expenses are billed at rates no less favorable to

² Capitalized terms used herein shall have the same meanings given to them in the Application.

the Debtors than those customarily employed by GJB generally (taking into consideration that GJB employs a variety of fee arrangements with its clients, including hourly fees, contingency fees and hybrid fees involving reduced hourly rates and reduced contingency fee percentages) and billed in accordance with the Engagement Letter and Retention Order; and (c) in providing a reimbursable services, GJB does not make a profit on that service, whether the service is performed by GJB in-house or through a third party.

6. In accordance with the Engagement Letter and Retention Order, GJB agreed to take a voluntary fee reduction equal to 20%, which results in a reduction in the amount of \$298,957.55 in the Application. GJB seeks allowance of all of its fees incurred during the Application Period in the amount of \$1,195,830.20, to the extent such amount has not been paid before the hearing scheduled on this Application).

7. GJB provides the following response to the request for information set forth in the U.S. Trustee Guidelines:

Question: Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees, or terms for services pertaining to this engagement that were provided during the Application Period?

Response: Yes. As a courtesy to the Committee and based on circumstances unique to the Title III Case, during the Application Period, GJB agreed to a voluntary reduction of its fees by an amount equal to 20% of the total fees sought to be paid, which reduction totals \$298,957.55.

Question: If the fees sought in this application as compared to the fees budgeted for the Application Period are higher by 10% or more, did you discuss the reasons for the variation with the client?

Response: The fees were below the budgeted amount, therefore the request is not applicable.

Question: Have any of the professionals included in this application varied their hourly rate based on the geographic location of the bankruptcy case?

Response: No.

Question: Does the application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

Response: The Application includes approximately 24.20 hours and associated fees of approximately \$13,137.50 related to preparing, reviewing, and revising GJB's fee statements.

Question: Does this application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

Response: No.

Question: If the application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation consistent with ABA Formal Ethics Opinion 11-458?

Response: No rate increases have occurred since the retention date.

8. I declare under penalty of perjury that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Executed this 16th day of March, 2020.

/s/ John H. Genovese

John H. Genovese
GENOVESE JOBLOVE & BATTISTA, P.A.
John H. Genovese, Esq. (*Pro Hac Vice*)
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Miami, FL 33131
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EXHIBIT B

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES

(See Guidelines ¶ C.3. for definitions of terms used in this Exhibit.)

CATEGORY OF TIMEKEEPER (using categories already maintained by the firm)	BLENDED HOURLY RATE		
	NON-BANKRUPTCY BLENDED HOURLY RATE	GJB BLENDED HOURLY RATE¹	GJB BLENDED HOURLY RATE (AFTER 20% REDUCTION)²
Partner	\$506	\$597	\$477
Counsel	N/A	N/A	N/A
Associate	\$306	\$387	\$309
All timekeepers aggregated	\$424	\$438	\$350

¹ The calculation of GJB's Blended Hourly Rate does not take into account GJB's agreement to reduce its fees by an amount equal to 20% of its total hourly fees.

² For illustrative purposes only.

EXHIBIT C

SUMMARY OF TIMEKEEPERS INCLUDED IN THIS APPLICATION

Name	Title or Position	Department, Group, or Section	Date of First Admission	Fees Billed in this Application	Hours Billed in this Application	Hourly Rate Billed		Number of Rate Increases Since Case Inception
						In this Application	In Second Interim Application	
Arrastia, John	Partner	Litigation	1996	\$247,365.00	448.50	\$550.00	\$550.00	0
Day, Allison R.	Partner	Bankruptcy	1985	\$26,125.00	41.80	\$625.00	\$625.00	0
Friedman, Michael A.	Partner	Bankruptcy	2009	\$39,600.00	72.00	\$550.00	\$550.00	1
Garno, Greg M	Partner	Bankruptcy	1996	\$2,142.00	3.40	\$630.00	\$360.00	N/A
Gayo-Guitian, Mariaelena	Partner	Bankruptcy	1989	\$70,207.50	122.10	\$575.00	\$575.00	0
Genovese, John H.	Partner	Bankruptcy	1979	\$278,842.50	364.50	\$765.00	\$765.00	1
Gonzalez, Alfredo L.	Partner	Corporate	1978	\$153,284.50	271.30	\$565.00	\$565.00	0
Suarez, Jesus M.	Partner	Bankruptcy	2008	\$126,250.00	252.50	\$500.00	\$500.00	1
Jacobs, Eric	Partner	Bankruptcy	2010	\$10,735.00	22.60	\$475.00	\$475.00	0
		Total Partner:		\$954,551.50	1,598.70			
Bado, Jean-Pierre	Associate	Litigation	2016	\$128,250.00	342.00	\$375.00	\$375.00	1
Castaldi, Angelo	Associate	Litigation	2009	\$117,600.00	313.60	\$375.00	\$375.00	1
Sadovnic, Irina	Associate	Litigation	2018	\$63,315.00	181.10	\$350.00	\$350.00	0
Fernandez-Barquin, Juan A.	Associate	Litigation	2008	\$86,350.00	185.70	\$465.00	N/A	N/A
		Total Associate:		\$395,515.00	1,022.40			
Hopkins, Colleen	Paralegal			\$6,220.50	31.90	\$195.00	\$195.00	0
Sardina, Jessey	Paralegal			\$5,205.00	69.40	\$75.00	\$75.00	0
Zamora, Johanna	Paralegal			\$26,149.50	134.20	\$195.00	\$195.00	0

Garcia-Montes, Tricia	Paralegal			\$252.00	2.10	\$120.00	\$120.00	0
Siff, Steve	Paralegal			\$106,128.75	544.25	\$195.00	\$195.00	0
Esser, Carolyn	Paralegal			\$765.00	5.10	\$150.00	\$150.00	0
		Total Paraprofessional:		\$144,720.75	786.95			
	Total:			\$1,494,787.25	3,408.05			
	Blended Rate:			\$438.61				
	Blended Rate Excluding Paraprofessionals:			\$515.07				

EXHIBIT D

BUDGET AND STAFFING PLAN

EXHIBIT D-1

BUDGETS FOR:
OCTOBER 2019
NOVEMBER 2019
DECEMBER 2019
JANUARY 2020

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
 Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel to the Official Committee Of Unsecured Creditors Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: October 1, 2019 through October 31, 2019¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2019 through October 31, 2019
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	75
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2
B113 Pleadings Review <i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i>	75

¹ This proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019.

<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. Further, GJB is not taking an active role on the run-of-the-mill stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>15</p>
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee</i></p>	<p>20</p>

<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	20
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	2
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	2
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	10
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	0

<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections. GJB anticipates primary responsibility for a potentially heavily litigated contested matter that is currently under continued review by the Committee.</i></p>	<p>450</p>
<p>B191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 21 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues.</i></p>	<p>600</p>
<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City.</i></p>	<p>60</p>

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	5
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	25
<p>B261 Investigations</p>	0

<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	10
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. This matter included work related to (a) the PREPA RSA and the related 9019 motion and (b) the anticipated filing of the Commonwealth plan of adjustment during the month of August. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	50
<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters.</i></p>	5
TOTAL HOURS	1428
TOTAL ESTIMATED FEE³	\$720,625.92
MINUS 20% REDUCTION	\$144,125.18
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$576,500.73

³ Assumes Blended Rate of \$504.64

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: October 1, 2019 through October 31, 2019

A. Adversary Proceeding Against Underwriters, Etc.

Genovese Joblove & Battista PA., the Committee's special litigation counsel, represents the Committee with respect to two separate adversary proceedings against: (a) numerous underwriters and other parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280]; and (b) the claims of PREPA against fuel oil suppliers and laboratories [Adv. Pro. No. 19-00388-LTS].

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2019 through October 31, 2019	Average hourly rate for period October 1, 2019 through October 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	5	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2019 through October 31, 2019
B191 General Litigation	385
TOTAL HOURS	385

B. Garden-Variety Avoidance Actions

Genovese Joblove & Battista PA., the Committee’s special litigation counsel, represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279]. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time to time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters. In at least one significant adversary proceeding, the Firm expects to be involved in briefing a contested motion to dismiss.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2019 through October 31, 2019	Average hourly rate for period October 1, 2019 through October 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2019 through October 31, 2019
B191 General Litigation	65
TOTAL HOURS	65

We also note that, on June 7, 2019, the co-plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. The Motion was granted on July 12, 2019 GJB anticipates that its workload with respect to “garden-variety” avoidance actions will reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

By orders dated June 13, 2019, the Court stayed, until September 1, 2019, several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee. These matters remain stayed by the Court's July 25, 2019 Order and referral of certain matters to mediation. However, the firm continues to be active in responding to defendants inquiries and participating in the substitution of parties in these adversaries.

- Eight adversary proceedings seeking to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, Adv. Proc. No. 19-284, Adv. Proc. No. 19-285, Adv. Proc. No. 19-286, Adv. Proc. No. 19-287, and Adv. Proc. No. 19-288];
- Seven adversary proceedings challenging liens asserted by certain holders of GO bonds [Adv. Proc. No. 19-291, Adv. Proc. No. 19-292, Adv. Proc. No. 19-293, Adv. Proc. No. 19-294, Adv. Proc. No. 19-295, Adv. Proc. No. 19-296, and Adv. Proc. No. 19-297];
- Seven adversary proceedings seeking to recover fraudulent transfers made on account of ERS bonds that were not validly issued [Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-358, Adv. Proc. No. 19-359, Adv. Proc. No. 19-360, and Adv. Proc. No. 19-361]; and
- Four adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-362, Adv. Proc. No. 19-363, Adv. Proc. No. 19-364, and Adv. Proc. No. 19-365].

In light of the upcoming expiration of the stay orders, GJB expects to expend significant time on the prosecution or potential resolution of these adversary proceedings.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period August 1, 2019 through August 31, 2019	Average hourly rate for period August 1, 2019 through August 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2019 through October 31, 2019
B191 General Litigation	40
TOTAL HOURS	40

D. ERS Lien Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. These matters were stayed pursuant to the July 25th, 2019 Order and no major work is anticipated during this period.

GJB is counsel of record for the Committee in Adv. Proc. No. 19-367.

Accordingly, GJB anticipates the commensurate amount of time on these adversary proceedings during the month of October 2019.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2019 through October 31, 2019	Average hourly rate for period October 1, 2019 through October 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2019 through October 31, 2019
B191 General Litigation	20
TOTAL HOURS	20

E. Contested Matters.

Genovese Joblove & Battista PA., the Committee's special litigation and conflicts counsel, represents the Committee with respect to several issues included, the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 relating to the RSA; and a potentially litigated contested matter that is currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019 will increase during the month of October as discovery has been postponed and is expected to take place.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period October 1, 2019 through October 31, 2019	Average hourly rate for period October 1, 2019 through October 31, 2019 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period October 1, 2019 through October 31, 2019
B190 Other Contested Matters	450

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: November 1, 2019 through November 30, 2019¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2019 through November 30, 2019
<p>B110 Case Administration</p> <p><i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i></p>	75
<p>B112 General Creditor Inquiries</p> <p><i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i></p>	2
<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	75

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019.

<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. Further, GJB is not taking an active role on the run-of-the-mill stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>15</p>
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee</i></p>	<p>20</p>

<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	20
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	2
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	2
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	10
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	0

B190 Other Contested Matters

Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections.

GJB anticipates primary responsibility for a potentially heavily litigated contested matter.

GJB anticipates continued involvement in the PREPA RSA 9019 dispute with respect to CITI and any other conflict situations.

500

<p>B191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 21 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues.</i></p> <p><i>GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings.</i></p> <p><i>GJB anticipates continued preparation and motion practice relating to litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene.</i></p>	<p>650</p>
<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City.</i></p>	<p>60</p>

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	5
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	50
<p>B261 Investigations</p>	0

<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	10
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. This matter included work related to (a) the PREPA RSA and the related 9019 motion and (b) the anticipated filing of the Commonwealth plan of adjustment during the month of November. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	75
<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters.</i></p>	5
TOTAL HOURS	1,578
TOTAL ESTIMATED FEE³	\$796,321.92
MINUS 20% REDUCTION	\$159,264.38
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$637, 057.54

³ Assumes Blended Rate of \$504.64

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: November 1, 2019 through November 30, 2019

A. Adversary Proceedings Against Financial Parties and Fuel Oil Defendants

Genovese Joblove & Battista PA., the Committee's special litigation counsel, represents the Committee with respect to two separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280]; and (b) the claims of PREPA against fuel oil suppliers and laboratories [Adv. Proc. No. 19-00388-LTS] (which is not stayed).

The stay relating to Adv. 19-280 is set to expire and the Firm will continue researching, evaluating, and revising amended claims for potential prosecution upon the expiration of the stay.

This representation includes the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280, which monoline suit has been removed to the PROMESA proceedings.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2019 through November 30, 2019	Average hourly rate for period November 1, 2019 through November 30, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	5	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2019 through November 30, 2019
B191 General Litigation	450
TOTAL HOURS	450

B. Garden-Variety Avoidance Actions

Genovese Joblove & Battista PA., the Committee’s special litigation counsel, represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279]. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time to time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

In at least one significant adversary proceeding, the Firm expects to be involved in motion practice after contesting defendant’s motion to dismiss. The Firm also expects litigation to develop with respect to another significant adversary proceeding.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2019 through November 30, 2019	Average hourly rate for period November 1, 2019 through November 30, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2019 through November 30, 2019
B191 General Litigation	125
TOTAL HOURS	125

We also note that, on June 7, 2019, the co-plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. The Motion was granted on July 12, 2019 GJB anticipates that its workload with respect to “garden-variety” avoidance actions will reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

By orders dated June 13, 2019, the Court stayed, until September 1, 2019, several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee. These matters remain stayed by the Court’s July 25, 2019 Order and referral of certain matters to mediation. However, the firm continues to be active in responding to defendants inquiries and participating in the substitution of parties in these adversaries.

- Eight adversary proceedings seeking to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, Adv. Proc. No. 19-284, Adv. Proc. No. 19-285, Adv. Proc. No. 19-286, Adv. Proc. No. 19-287, and Adv. Proc. No. 19-288];

Excepted from the stay was the dismissal of the “street name” bondholders and modification of the proceedings to reflect the hundreds of actual beneficial holders of bond interests in these proceedings.

- Seven adversary proceedings challenging liens asserted by certain holders of GO bonds [Adv. Proc. No. 19-291, Adv. Proc. No. 19-292, Adv. Proc. No. 19-293, Adv. Proc. No. 19-294, Adv. Proc. No. 19-295, Adv. Proc. No. 19-296, and Adv. Proc. No. 19-297];
- Seven adversary proceedings seeking to recover fraudulent transfers made on account of ERS bonds that were not validly issued [Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-358, Adv. Proc. No. 19-359, Adv. Proc. No. 19-360, and Adv. Proc. No. 19-361]; and

- Four adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-362, Adv. Proc. No. 19-363, Adv. Proc. No. 19-364, and Adv. Proc. No. 19-365].

In light of the upcoming expiration of the stay orders, GJB expects to expend significant time on the prosecution or potential resolution of these adversary proceedings.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2019 through November 30, 2019	Average hourly rate for period November 1, 2019 through November 30, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2019 through November 30, 2019
B191 General Litigation	75
TOTAL HOURS	75

D. ERS Lien Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. These matters were stayed pursuant to the July 25th, 2019 Order and no major work is anticipated during this period.

GJB is counsel of record for the Committee in Adv. Proc. No. 19-367.

Accordingly, GJB anticipates the commensurate amount of time on these adversary proceedings during the month of November 2019.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2019 through November 30, 2019	Average hourly rate for period November 1, 2019 through November 30, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2019 through November 30, 2019
B191 General Litigation	20
TOTAL HOURS	20

E. Contested Matters.

Genovese Joblove & Battista PA., the Committee's special litigation and conflicts counsel, represents the Committee with respect to several issues included, the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019 will increase during the month of November as discovery and hearing preparation continues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2019 through November 30, 2019	Average hourly rate for period November 1, 2019 through November 30, 2019 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period November 1, 2019 through November 30, 2019
B190 Other Contested Matters	500
TOTAL HOURS	500

GENERAL STAFFING PLAN

Period Covered: November 1, 2019 through November 30, 2019⁴

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period November 1, 2019 through November 30, 2019	Average hourly rate for period November 1, 2019 through November 30, 2019 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019.

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: December 1, 2019 through December 31, 2019¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2019 through December 31, 2019
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	60
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2
B113 Pleadings Review <i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i>	60

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019.

<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. Further, GJB is not taking an active role on the run-of-the-mill stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>15</p>
<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee</i></p>	<p>30</p>

<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	<p>20</p>
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	<p>2</p>
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	<p>2</p>
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	<p>2</p>
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	<p>30</p>
<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>

B190 Other Contested Matters

Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections.

GJB anticipates primary responsibility for a potentially heavily litigated contested matter.

GJB anticipates continued involvement in the PREPA RSA 9019 dispute with respect to CITI and any other conflict situations.

400

<p>B191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)</p> <p><i>Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will including (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 21 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues.</i></p> <p><i>GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.</i></p> <p><i>GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings.</i></p> <p><i>GJB anticipates continued preparation and motion practice relating to litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene.</i></p>	<p>500</p>
<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City.</i></p>	<p>25</p>

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	5
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0
<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	50
<p>B261 Investigations</p>	0

<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	10
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. This matter included work related to (a) the PREPA RSA and the related 9019 motion and (b) the anticipated filing of the Commonwealth plan of adjustment during the month of December. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	75
<p>B420 Restructurings</p> <p><i>Notes: This task code includes time spent on general restructuring matters.</i></p>	5
TOTAL HOURS	1,293
TOTAL ESTIMATED FEE³	\$652,499.52
MINUS 20% REDUCTION	\$130,499.9
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$521,999.62

³ Assumes Blended Rate of \$504.64

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: December 1, 2019 through December 31, 2019

A. Adversary Proceedings Against Financial Parties and Fuel Oil Defendants

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280]; and (b) the claims of PREPA against fuel oil suppliers and laboratories [Adv. Pro. No. 19-00388-LTS] (which is not stayed).

The stay relating to Adv. Proc. No. 19-280 is set to expire and GJB will continue researching, evaluating, and revising amended claims for potential prosecution upon the expiration of the stay.

This representation includes the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280, which monoline suit has been removed to the PROMESA proceedings.

The litigation in Adv. Proc. No. 388 is currently not stayed and proceeding in the normal course of litigation.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period December 1, 2019 through December 31, 2019	Average hourly rate for period December 1, 2019 through December 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	5	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2019 through December 31, 2019
B191 General Litigation	300
TOTAL HOURS	300

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279]. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time to time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

In at least one significant adversary proceeding, GJB expects to be involved in motion practice after contesting defendant’s motion to dismiss. GJB also expects litigation to develop with respect to another significant adversary proceeding.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period December 1, 2019 through December 31, 2019	Average hourly rate for period December 1, 2019 through December 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2019 through December 31, 2019
B191 General Litigation	40
TOTAL HOURS	40

We also note that, on June 7, 2019, the co-plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. The Motion was granted on July 12, 2019, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

Pursuant to Judge Swain’s order at the July 24th, 2019 omnibus hearing, the Court extended the stayed, until December 31, 2019, several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee. These matters remain stayed while the parties work with the mediators on a process to resolve these adversary proceedings and other plan related matters. However, GJB continues to be active in responding to defendants inquiries and participating in the substitution of parties in these adversaries.

- Eight adversary proceedings seeking to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, Adv. Proc. No. 19-284, Adv. Proc. No. 19-285, Adv. Proc. No. 19-286, Adv. Proc. No. 19-287, and Adv. Proc. No. 19-288];

Excepted from the stay was the dismissal of the “street name” bondholders and modification of the proceedings to reflect the hundreds of actual beneficial holders of bond interests in these proceedings.

- Seven adversary proceedings challenging liens asserted by certain holders of GO bonds [Adv. Proc. No. 19-291, Adv. Proc. No. 19-292, Adv. Proc. No. 19-293, Adv. Proc. No. 19-294, Adv. Proc. No. 19-295, Adv. Proc. No. 19-296, and Adv. Proc. No. 19-297];
- Seven adversary proceedings seeking to recover fraudulent transfers made on account of ERS bonds that were not validly issued [Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-358, Adv. Proc. No. 19-359, Adv. Proc. No. 19-360, and Adv. Proc. No. 19-361]; and

- Four adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-362, Adv. Proc. No. 19-363, Adv. Proc. No. 19-364, and Adv. Proc. No. 19-365].

In light of the upcoming expiration of the stay orders, GJB expects to expend significant time on the prosecution or potential resolution of these adversary proceedings.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period December 1, 2019 through December 31, 2019	Average hourly rate for period December 1, 2019 through December 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2019 through December 31, 2019
B191 General Litigation	40
TOTAL HOURS	40

D. ERS Lien Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. These matters had been stayed pursuant to the July 25th, 2019 Order, but such stay was recently lifted as to certain issues and pleading and discovery has resumed in part.

GJB is counsel of record for the Committee in Adv. Proc. No. 19-367.

Accordingly, GJB anticipates the commensurate amount of time on these adversary proceedings during the month of December 2019.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period December 1, 2019 through December 31, 2019	Average hourly rate for period December 1, 2019 through December 31, 2019 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2019 through December 31, 2019
B191 General Litigation	120
TOTAL HOURS	120

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019 will increase during the month of December as hearing preparation continues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the	Number of timekeepers expected to work on the matter during the budget	Average hourly rate for period December 1, 2019 through December	Average hourly rate for period December 1, 2019 through December 31, 2019 (net of
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firm)	period	31, 2019	20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period December 1, 2019 through December 31, 2019
B190 Other Contested Matters	400
TOTAL HOURS	400

GENERAL STAFFING PLAN

Period Covered: December 1, 2019 through December 31, 2019⁴

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period December 1, 2019 through December 31, 2019	Average hourly rate for period December 1, 2019 through December 31, 2019 (net of 20% reduction)
Partner (20+	5	\$615	\$492

⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019.

Years)			
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

Case Name and Number: 17 BK 3283-LTS (Jointly Administered)
Applicant's Name: Genovese, Joblove & Battista, P.A., as Special Litigation Counsel
to the Official Committee Of Unsecured Creditors
Of The Commonwealth Of Puerto Rico, *et al.*

BUDGET

Period Covered: January 1, 2020 through January 31, 2020¹

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2020 through January 31, 2020
B110 Case Administration <i>Notes: This task code includes general case strategy and planning, case management, internal Committee matters, internal meetings, and meetings with Paul Hastings.</i>	25
B112 General Creditor Inquiries <i>Notes: This task code includes responding to and addressing questions and inquiries from creditors.</i>	2

¹ Unless otherwise indicated, this proposed budget is based on the following assumptions: (i) no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss, motions to stay, and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the Stay Order announced by the Court on July 24, 2019, as subsequently amended and modified, as well as the pending, interim recommendations of the Mediation Team, the revised briefing schedule, the rescheduled PREPA RSA 9019 hearing, and the December 10, 2019 Magistrate Judge's Stay Order. The Mediation Team's proposed, interim case management order has not yet been entered by the Court, so the status of litigation in the Underwriter Complaint (AP19-280) is yet uncertain although a stay is anticipated.

<p>B113 Pleadings Review</p> <p><i>Notes: This task code includes review of relevant pleadings in the title III cases as well as all related adversary proceedings. GJB will focus its review on matters that impact its scope of work.</i></p>	<p>22</p>
<p>B120 Asset Analysis and Recovery</p> <p><i>Notes: This task code includes review and analysis of the Debtors' assets, including proceeds from insurance policies.</i></p>	<p>0</p>
<p>B130 Asset Disposition</p> <p><i>Notes: This task code includes work related to the Debtors' efforts to sell or otherwise dispose of their assets.</i></p>	<p>0</p>
<p>B140 Relief from Stay / Adequate Protection Proceedings</p> <p><i>Notes: This task code includes work related to motions for relief from stay, including the stay relief motion filed by the ERS bondholders and the receiver motion filed by the PREPA bondholders. Further, GJB is not taking an active role on the run-of-the-mill stay relief requests and its role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>
<p>B150 Meetings of Creditors' Committee and Communications with Creditors</p> <p><i>Notes: This task code includes time spent on telephone conferences, meetings, and other communications with the Committee, including preparation for such calls and meetings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings.</i></p>	<p>22</p>

<p>B155 Court Hearings</p> <p><i>Notes: This task codes includes time spent in court hearings in the title III cases and the related adversary proceedings. This task code also includes time spent preparing for such hearings. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings and the Special Claims Committee</i></p>	17
<p>B160 Employment / Fee Applications</p> <p><i>Notes: This task code includes time spent on complying with the interim compensation order, including preparing GJB's fee statements, as well as responding to inquiries from the fee examiner related thereto.</i></p>	13
<p>B161 Budgeting (Case)</p> <p><i>Notes: This task code includes time spent on preparing GJB's monthly budgets, as required by the fee examiner.</i></p>	2
<p>B165 Fee and Employment Applications of Other Professionals</p> <p><i>Notes: This task code includes time spent on reviewing fee and retention applications of other professionals in these title III cases only as it relates to (i) committee professionals operating at the direction of GJB as conflicts counsel; or (ii) where matters principally handled by GJB are implicated.</i></p>	2
<p>B170 Fee and Employment Objections</p> <p><i>Notes: This task code includes time spent on preparing or responding to objections to fee and retention applications.</i></p>	2
<p>B180 Avoidance Action Analysis</p> <p><i>Notes: This task code includes time spent on analyzing potential claims for avoidance, including preferential transfers and fraudulent transfers. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings or other counsel handling such matters for the Committee or the Special Claims Committee, to the extent it is a Co-Plaintiff.</i></p>	10

<p>B185 Assumption / Rejection of Leases and Contracts</p> <p><i>Notes: This task code includes time spent on analyzing issues related to the assumption or rejection of executory contracts and unexpired leases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. .</i></p>	<p>0</p>
<p>B190 Other Contested Matters</p> <p><i>Notes: This task code includes time spent on all contested matters in the title III cases. GJB's role in this category is limited to instances, if any, where Paul Hastings may have a conflict. GJB anticipates potential main case litigation concerning matters where Paul Hastings has identified conflicts with parties that may become potentially adverse to the Committee. Further, adverse and interested parties to litigation initiated by GJB on behalf of the Committee have sought to participate in main case issues, including claims objections.</i></p> <p><i>GJB expects primary responsibility for an anticipated 9019 dispute regarding an adversary defendant</i></p> <p><i>GJB anticipates continued involvement in the PREPA RSA 9019 dispute with respect to CITI and any other conflict situations, however, such matters have been rescheduled by the Court .</i></p>	<p>80</p>

B191 General Litigation (including Commonwealth litigation, mediation process, and handling of adversary proceedings)

Notes: This task code includes time spent on litigation matters, including all adversary proceedings. We anticipate that work under this task code will include (a) the joint prosecution of causes of action together with Oversight Board/Special Claims Committee in 22 separate lawsuits, and (b) monitoring other adversary proceedings and litigation. GJB's role in this category is limited to those adversary proceedings in which GJB has appeared as and is the lead counsel for the Committee. This role may require coordination with other counsel in related matters concerning global legal issues.

GJB anticipates primary responsibility regarding an adversary proceeding removed to the PROMESA court regarding monoline insurers' claims against underwriter defendants.

GJB anticipates continued briefing relating to motion practice relating to pending adversary proceedings and continued discovery as to limited issues excepted from the Stay or pursuant to the Mediation Team's recommendation

GJB anticipates a limited stay of litigation on behalf of PREPA regarding fuel oil claims, which also includes the motion practice relating to the class action plaintiffs' effort to intervene. During the stay period GJB anticipates preparing for post-stay litigation and discovery. Certain Fuel Oil-related litigation is not stayed, and may be subject to briefing at the Committee's discretion..

<p>B195 Non-Working Travel²</p> <p><i>Notes: This task code includes time spent on non-working travel, including to court hearings and Committee meetings in San Juan, Boston and New York City.</i></p>	20
<p>B210 Debtors' Financial Information and Operations/Fiscal Plan</p> <p><i>Notes: This task code includes time spent reviewing and analyzing the Debtors' fiscal plans and related matters. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict or where GJB may need to familiarize itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	5
<p>B220 Employee Benefits/Pensions</p> <p><i>Notes: This task code includes time spent reviewing and analyzing matters related to retiree benefit claims.</i></p>	0
<p>B230 Financing / Cash Collections</p> <p><i>Notes: This task code includes time spent on dealing with the Debtors' requests for financing, most notably the financing sought by PRASA.</i></p>	0
<p>B231 Security Document Analysis</p> <p><i>Notes: This task code includes time spent on reviewing and analyzing security documents and results from lien searches.</i></p>	0

² The firm charges one-half a timekeeper's normal billing rate for any time incurred on account of non-working travel.

<p>B260 Meetings of and Communications with Debtors/Oversight Board</p> <p><i>Notes: This task code includes time spent on meeting and communicating with the Debtors, the Oversight Board, and their respective advisors. GJB anticipates significant collaboration with the Special Claims Committee of the FOMB on matters GJB has appears as conflicts counsel.</i></p>	<p>23</p>
<p>B261 Investigations</p>	<p>0</p>
<p>B310 Claims Administration and Objections</p> <p><i>Notes: This task code includes time spent on matters related to claims administration, including time spent on investigating potential challenges to claims, including, most notably, the challenge to the GO bond claims and the ERS bond claims. This task code also includes time spent on analyzing the pool of unsecured claims against the Debtors. GJB is role in this category is limited to instances, if any, where Paul Hastings may have a conflict.</i></p>	<p>20</p>
<p>B320 Plan and Disclosure Statement</p> <p><i>Notes: This task code includes time spent on matters related to a potential plan of adjustment for the title III Debtors. This matter included work related to (a) the PREPA RSA and the related 9019 motion and (b) the anticipated filing of the Commonwealth plan of adjustment. GJB will focus its participation on matters that impact its scope of work and avoid unnecessary duplication with Paul Hastings. Given the Oversight Board's recent filing of the Commonwealth plan of adjustment, GJB anticipates spending time familiarizing itself with matters that may impact litigation where GJB is serving as conflicts counsel to the Committee.</i></p>	<p>65</p>

B420 Restructurings	
<i>Notes: This task code includes time spent on general restructuring matters, including the PREPA RSA and the related 9019 motion.</i>	
	15
TOTAL HOURS	475
TOTAL ESTIMATED FEE³	\$217,744.75
MINUS 20% REDUCTION	\$43,548.95
TOTAL ESTIMATED FEE (NET OF REDUCTION)	\$174,195.8

³ Assumes Blended Rate of \$458.41

**ADDITIONAL STAFFING PLANS (INCL. SUB-BUDGETS)
FOR MATTERS JOINTLY PURSUED BY OVERSIGHT BOARD AND COMMITTEE**

Period Covered: January 1, 2020 through January 31, 2020

A. Adversary Proceedings Against Financial Parties and Fuel Oil Defendants

Genovese Joblove & Battista PA., (“GJB” or “Firm”) as the Committee’s special litigation counsel, represents the Committee with respect to two separate adversary proceedings against: (a) numerous underwriters and other financial target parties involved in the issuance of Commonwealth bonds [Adv. Proc. No. 19-280]; and (b) the claims of PREPA against fuel oil suppliers and laboratories to avoid certain fraudulent transfers [Adv. Pro. No. 19-00388-LTS] (which is not stayed).

The stay relating to Adv. Proc. No. 19-280 was set to expire in January 2020, but the proposed interim case management order submitted by the mediation team would continue that stay

This representation includes the evaluation and if warranted, litigation of, a lawsuit filed by certain monoline insurers to assert claims against the same defendants sued by the Committee in Adv. Proc. No. 19-280, which monoline suit has been removed to the PROMESA proceedings.

The litigation in Adv. Proc. No. 388 has been stayed through June 2020 with certain court-imposed obligations prior to that time. Related litigation exists that must be evaluated and considered.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2020 through January 31, 2020	Average hourly rate for period January 1, 2020 through January 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$680	\$544
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2020 through January 31, 2020
B191 General Litigation	50
TOTAL HOURS	85

B. Garden-Variety Avoidance Actions

GJB represents the Committee with respect to limited “garden-variety” avoidance actions [Adv. Proc. Nos. 19-267, 19-275-279]. Casillas, Santiago & Torres LLC, the Committee’s local counsel, represents the Committee with respect to the balance of the “garden-variety” avoidance actions initiated against vendors of the Commonwealth of Puerto Rico [Adv. Proc. Nos. 19-041 to 19-279, Adv. Proc. Nos. 19-347 to 19-354, and additional adversary proceedings to be commenced with respect to PREPA]. However, GJB may, from time-to-time, provide additional assistance to other committee counsel with respect to litigation matters within GJB’s subject matter expertise, but in no way duplicative of the work performed by other counsel on these matters.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2020 through January 31, 2020	Average hourly rate for period January 1, 2020 through January 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2020 through January 31, 2020
B191 General Litigation	20
TOTAL HOURS	20

We also note that, on June 7, 2019, the co-plaintiffs in these avoidance actions filed a motion [Docket No. 7325] seeking approval of, among other things, procedures establishing a framework for streamlined execution of settlement agreements and procedures and guidelines for resolving the avoidance actions through a voluntary mediation process. On July 12, 2019, the Court entered an “*Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” On December 6, 2019, the Court entered an “*Order Granting Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, acting by and through the Members of the Special Claims Committee and the Official Committee of Unsecured Creditors to (i) Establish Litigation Case Management Procedures and (ii) Establish Procedures for Approval of Settlements.*” Accordingly, the Response Due Date was extended to April 13, 2020, the Motion to Dismiss Response Date was extended to May 13, 2020 and the Reply Deadline was extended to June 13, 2020. Accordingly, GJB anticipates that its workload with respect to “garden-variety” avoidance actions will be reduced.

C. Currently Stayed Co-Plaintiff Adversary Proceedings

Pursuant to Judge Swain’s order at the July 24th, 2019 omnibus hearing (as subsequently modified), the Court extended the stayed, until December 31, 2019, several adversary proceedings for which the Committee has been appointed as co-plaintiff/co-trustee with the Oversight Board or the members of the Special Claims Committee. These matters remain stayed while the parties work with the mediators on a process to resolve these adversary proceedings and other plan related matters. The mediation team has submitted a proposed interim case management order which is expected to be entered and result in a continued stay.

- Eight adversary proceedings seeking to recover fraudulent transfers made on account of GO bonds that were not validly issued [Adv. Proc. No. 19-281, Adv. Proc. No. 19-282, Adv. Proc. No. 19-283, Adv. Proc. No. 19-284, Adv. Proc. No. 19-285, Adv. Proc. No. 19-286, Adv. Proc. No. 19-287, and Adv. Proc. No. 19-288]; and
- Four adversary proceedings challenging liens asserted by certain holders of HTA bonds [Adv. Proc. No. 19-362, Adv. Proc. No. 19-363, Adv. Proc. No. 19-364, and Adv. Proc. No. 19-365].

Provided that the current stay remains in place and is not otherwise modified, GJB does not expect to expend any significant time on these adversary proceedings, other than minor administrative and/or procedural work, including responding to inquiries from defendants and assisting Brown Rudnick and Proskauer, in general administration of these cases. Excepted from the stay was the dismissal of the “street name” bondholders and modification of the proceedings to reflect the hundreds of actual beneficial holders of bond interests in these proceedings.

- Seven adversary proceedings challenging liens asserted by certain holders of GO bonds [Adv. Proc. No. 19-291, Adv. Proc. No. 19-292, Adv. Proc. No. 19-293, Adv. Proc. No. 19-294, Adv. Proc. No. 19-295, Adv. Proc. No. 19-296, and Adv. Proc. No. 19-297];
- Seven adversary proceedings seeking to recover fraudulent transfers made on account of ERS bonds that were not validly issued [Adv. Proc. No. 19-355, Adv. Proc. No. 19-356, Adv. Proc. No. 19-357, Adv. Proc. No. 19-358, Adv. Proc. No. 19-359, Adv. Proc. No. 19-360, and Adv. Proc. No. 19-361]; and

In light of the upcoming expiration of the stay orders, GJB expects to expend significant time on the prosecution or potential resolution of these adversary proceedings.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2020 through January 31, 2020	Average hourly rate for period January 1, 2020 through January 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2020 through January 31, 2020
B191 General Litigation	25

TOTAL HOURS	25
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D. ERS Lien Co-Plaintiff Adversary Proceedings

Proskauer Rose LLP, as counsel to the Oversight Board, has primary responsibility for the adversary proceedings seeking declarations on the scope of the liens purportedly securing the ERS bonds [Adv. Proc. No. 19-366 and Adv. Proc. No. 19-367]. GJB is counsel of record for the Committee in Adv. Proc. No. 19-367. These matters had been stayed pursuant to the July 25th, 2019 Order, but on October 24, 2019, the Court approved a scheduling order regarding discovery and summary judgment briefing on the lien scope issues and *ultra vires* issues with respect to the ERS bonds and lifted the stay. As such, certain issues and pleading and discovery has resumed in part.

Accordingly, GJB anticipates the commensurate amount of time on these adversary proceedings during the month of January 2020 handling, among other things, the *ultra vires* issues as they relate to count I of the recovery actions.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2020 through January 31, 2020	Average hourly rate for period January 1, 2020 through January 31, 2020 (net of 20% reduction)
Partner (20+ Years)	2	\$575	\$460
Partner (10+ Years)	2	\$500	\$400
Associate	2	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2020 through January 31, 2020
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B191 General Litigation	15
TOTAL HOURS	25

E. Contested Matters.

GJB represents the Committee with respect to several issues, including the following: the Adversary Defendants motion to participate in the GO Bond Claim Objections (and related mediation process); PREPA 9019 Motion relating to the RSA; and anticipated, litigated contested matters that are currently under advisement by the Committee. GJB anticipates its involvement in the PREPA 9019 will increase during the month of January as hearing preparation continues.

1. Staffing Plan

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2020 through January 31, 2020	Average hourly rate for period January 1, 2020 through January 31, 2020 (net of 20% reduction)
Partner (20+ Years)	3	\$645	\$516
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

2. Sub-Budget

U.S. Trustee Task Code and Project Category	Estimated Hours for Period January 1, 2020 through January 31, 2020
B190 Other Contested Matters	350
TOTAL HOURS	350

GENERAL STAFFING PLAN

Period Covered: January 1, 2020 through January 31, 2020⁴

⁴ Unless otherwise indicated in this budget, this proposed staffing plan is based on the following assumptions: (i)

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period January 1, 2020 through January 31, 2020	Average hourly rate for period January 1, 2020 through January 31, 2020 (net of 20% reduction)
Partner (20+ Years)	5	\$615	\$492
Partner (10+ Years)	2	\$525	\$420
Associate	4	\$375	\$300
Paraprofessionals	2	\$195	\$156

no additional title III cases or adversary proceedings will be commenced during the budget period; (ii) no plan of adjustment will be filed during the budget period; (iii) no adversary proceedings will require discovery and trial preparation; and (iv) all adversary proceedings in which the Committee has intervened and/or sought to intervene will only involve briefing and hearings on motions to dismiss and/or pretrial proceedings. In addition, it is impossible to predict how many hours will be required to prosecute contested matters where GJB is asked to participate as conflicts counsel. Thus, this proposed budget may be materially different from the work actually performed. For instance, discovery disputes may lead to extensive litigation. Similarly, the Committee may need to respond to motions that are not and cannot be anticipated. At this time, the proposed budget is speculative. The proposed amended budget has been revised to account for the stay of litigation and other proceedings.

EXHIBIT D-2

STAFFING PLAN

Period Covered: October 1, 2019 through January 31, 2020

Category of timekeeper (using categories maintained by the firm)	Number of timekeepers expected to work on the matter during the budget period	Average hourly rate for period 10/01/19 through 01/31/20	Average hourly rate for period 10/01/19 through 01/31/20 (net of 20% reduction)
Partner	8	\$576.02	\$460.82
Associate	4	\$372.22	\$297.78
Paraprofessionals	6	\$193.10	\$154.48

EXHIBIT E

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

EXHIBIT E-1

SUMMARY OF COMPENSATION REQUESTED BY PROJECT CATEGORY

U.S. Trustee Task Code and Project Category	Hours Billed				
	October 2019	November 2019	December 2019	January 2020	Total
B110 Case Administration	14.50	14.20	6.20	22.70	57.10
B112 General Creditor Inquiries	0.00	0.00	0.00	0.00	0.00
B113 Pleadings Review	129.60	119.20	93.00	97.90	439.80
B120 Asset Analysis and Recovery	0.00	0.00	0.00	0.00	0.00
B130 Asset Disposition	0.00	0.00	0.00	0.00	0.00
B140 Relief from Stay / Adequate Protection Proceedings	0.00	0.00	0.00	0.00	0.00
B150 Meetings of Creditors' Committee and Communications with Creditors	3.60	17.80	0.00	8.40	25.90
B155 Court Hearings (including Preparation for Court Hearings)	0.00	0.00	2.40	5.60	8.00
B160 Employment / Fee Applications	30.60	54.10	18.40	5.50	106.60
B161 Budgeting (Case)	6.50	2.60	7.80	10.00	26.80
B165 Employment / Fee Applications (Other Professionals)	0.30	2.20	0.50	0.00	3.00
B170 Fee and Employment Objections	0.00	0.00	0.00	0.00	0.00
B180 Avoidance Action Analysis	1.20	0.00	0.00	0.00	1.20
B181 Preference Analysis and Recovery Action	0.00	0.00	1.10	0.00	1.10
B185 Assumption / Rejection of Leases and Contracts	0.00	0.00	0.00	0.00	0.00
B190 Other Contested Matters (including GDB restructuring)	115.70	29.10	12.90	1.80	158.70
B191 General Litigation	1,026.35	708.20	466.40	306.40	2,494.30
B195 Non-Working Travel	17.20	0.00	9.30	9.90	36.40
B210 Debtors' Financial Information and Operations/Fiscal Plan	0.00	0.30	0.00	0.00	0.00
B220 Employee Benefits / Pensions	0.00	0.00	0.00	0.00	0.00
B230 Financing / Cash Collections	0.00	0.00	0.00	0.00	0.00
B231 Security Document Analysis	0.00	0.00	0.00	0.00	0.00
B260 Meetings of and Communications with Debtors/Oversight Board	1.20	0.00	0.00	0.00	1.20
B261 Investigations	0.00	0.00	0.00	0.00	0.00

B310 Claims Administration and Objections	0.00	0.00	0.00	0.00	0.00
B312 Objections to Claims	0.00	0.00	0.00	0.00	0.00
B320 Plan and Disclosure Statement	8.90	0.00	2.30	15.60	25.70
B321 Business Plan	0.00	0.00	0.00	0.00	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00	0.00	0.00	0.00
B420 Restructurings	0.00	0.00	0.00	0.60	0.60
TOTAL HOURS	1,355.65	947.70	620.30	484.40	3,523.05
TOTAL FEES	\$606,059.25	\$418,140.50	\$263,706.75	\$206,881.25	\$1,494,787.75
MINUS 20% REDUCTION	(\$121,211.85)	(\$83,628.10)	(\$52,741.35)	(\$41,376.25)	(\$298,957.55)
TOTAL FEES (NET OF REDUCTION)	\$484,847.40	\$334,512.40	\$210,965.40	\$165,505.00	\$1,195,830.20

**FURTHER BREAKDOWN OF COMPENSATION REQUESTED
BY PROJECT CATEGORY AND BY MATTER¹**

Official Committee of Unsecured Creditors of Commonwealth of PR (Matter ID 001)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	38.80	\$14,480.00
B113 Pleadings Review	437.40	\$85,407.00
B150 Meeting of Creditors	24.30	\$13,650.00
B155 Court Hearings	5.60	\$3,220.00
B160 Employment / Fee Applications (GJB)	105.20	\$46,905.50
B161 Budgeting (Case)	26.50	\$16,089.00
B165 Employment / Fee Applications (Other Professionals)	1.80	\$898.50
B180 Avoidance Action Analysis	1.20	\$234.00
B181 Preference Analysis and Recovery Actions	1.10	\$214.50
B190 Other Contested Matters	10.40	\$5,205.00
B191 General Litigation	1,687.05	\$815,114.25
B195 Non-Working Travel	9.90	\$2,846.25
B210 Debtors' Fiscal Plan	0.30	\$172.50
B320 Plan and Disclosure Statement	26.80	\$14,138.00
B420 Restructurings	0.60	\$345.00
TOTAL	2,376.95	\$1,018,919.50

PREPA (Matter ID 002)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	8.00	\$2,012.00
B113 Pleadings Review	2.30	\$1,322.50
B150 Meeting of Creditors	5.40	\$3,105.00
B155 Court Hearings	2.40	\$1,380.00
B160 Employment / Fee Applications (GJB)	2.70	\$1,552.50
B161 Budgeting	0.40	\$230.00
B165 Fee-Employment Other Professionals	1.10	\$841.50
B190 Other Contested Matters	145.50	\$79,982.00
B191 General Litigation	642.80	\$297,481.00
B195 Non-Working Travel	26.50	\$7,618.75

B260 Meetings and Communications with Board	0.70	\$402.50
TOTAL	837.80	\$395,927.75

ERS (Matter ID 003)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B110 Case Administration	10.80	\$2,014.50
B150 Meetings of Creditors	0.10	\$57.50
B129 Fee/Employment Applications	0.50	\$287.50
B165 Fee/Employment Other Professionals	0.10	\$57.50
B190 Other Contested Matters	3.60	\$702.00
B191 General Litigation	175.50	\$75,497.00
B260 Meetings of and Communications with Board	0.50	\$287.50
TOTAL	191.10	\$78,903.50

HTA (Matter ID 004)

U.S. Trustee Task Code and Project Category	Hours Billed	Fees Sought
B129 Fee/Employment Applications	0.20	\$115.00
B191 General Litigation	2.00	\$922.00
TOTAL	2.20	\$1,037.00

Kobre & Kim Report (Matter ID 005)

N/A

EXHIBIT E-2

SUMMARY OF EXPENSE REIMBURSEMENTS REQUESTED BY CATEGORY

Category	Amount
Travel Expenses – Airfare	\$2,275.94
Travel Expenses – Lodging	\$2,220.93
Travel Expenses - Taxi / Ground Transportation	\$283.44
Travel Expenses – Parking	\$153.00
Meals (while working on Committee matters)	\$108.88
Court call	\$0.00
Long Distance Phone Calls	\$0.00
Process Service Fee	\$0.00
Messenger	\$0.00
Computer Search	\$1,419.30
Articles and Publications	\$0.00
Court Reporting Services	\$0.00
In-house Black and White Reproduction Charges (21,185 copies at \$0.10 per page)	\$2,118.50
Outside Photocopies	\$0.00
Outside Professional Services	\$0.00
Postage/Express Mail	\$0.00
Data Management/Web Hosting	\$24,716.96
Miscellaneous	\$0.00
TOTAL	\$33,296.95

EXHIBIT F

**BREAKDOWN OF COMPENSATION AND EXPENSE REIMBURSEMENT AND BY
WHETHER SERVICES WERE RENDERED IN PUERTO RICO OR OUTSIDE
PUERTO RICO**

October 2019 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth	\$337,816.25	\$270,235.00 (\$67,563.25)	\$243,227.70	\$4,153.17	\$247,380.87
<i>(a) Services Rendered Outside of Puerto Rico</i>	\$337,816.25	\$270,235.00	\$243,227.10	\$4,153.17	\$247,380.87
<i>(b) Services Rendered in Puerto Rico</i>	N/A	N/A	N/A	N/A	N/A
Total for PREPA (all outside of Puerto Rico)	\$249,344.00	\$199,475.20 (\$49,868.80)	\$179,527.68	\$3,515.86	\$183,043.54
Total for ERS (all outside of Puerto Rico)	\$18,784.00	\$15,027.20 (\$3,756.80)	\$13,524.48	\$26.85	\$13,551.33
Total for HTA (all outside of Puerto Rico)	\$115.00	\$92.00 (\$23.00)	\$82.80	\$0.00	\$82.80
Grand Total	\$606,059.25	\$484,847.40	\$436,362.66	\$7,695.88	\$444,058.54

November 2019 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth	\$305,501.50	\$244,401.20 (\$61,100.30)	\$219,961.08	\$7,233.83	\$227,194.91
<i>(a) Services Rendered Outside of Puerto Rico</i>	\$305,501.50	\$244,401.20 (\$61,100.30)	\$219,961.08	\$7,233.83	\$227,194.91
<i>(b) Services Rendered in Puerto Rico</i>	N/A	N/A	N/A	N/A	N/A
Total for PREPA (all outside of Puerto Rico)	\$92,388.00	\$73,910.40 (\$18,477.60)	\$66,519.36	\$57.30	\$66,576.66
Total for ERS (all outside of Puerto Rico)	\$20,251.00	\$16,200.80 (\$4,050.20)	\$14,580.72	\$30.00	\$14,610.72
Total for HTA (all outside of Puerto Rico)	N/A	N/A	N/A	N/A	N/A
Grand Total	\$418,140.50	\$334,512.40	\$301,061.16	\$7,321.13	\$308,382.29

December 2019 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth	\$196,535.50	\$157,228.40 (\$39,307.10)	\$141,505.56	\$8,191.43	\$149,696.99
<i>(a) Services Rendered outside of Puerto Rico</i>	<i>\$196,535.50</i>	<i>\$157,228.40</i> <i>(\$56,367.50)</i>	<i>\$141,505.56</i>	<i>\$8,191.43</i>	<i>\$149,696.99</i>
<i>(b) Services Rendered in Puerto Rico</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>	<i>\$0.00</i>
Total for PREPA	\$44,867.25	\$35,893.80	\$32,304.42	\$1,425.83	\$33,730.25
<i>(a) Services Rendered outside of Puerto Rico</i>	<i>\$42,682.25</i>	<i>\$34,145.80</i> <i>(\$8,536.45)</i>	<i>\$30,731.22</i>	<i>\$1,057.26</i>	<i>\$31,788.48</i>
<i>(b) Services Rendered in Puerto Rico</i>	<i>\$2,185.00</i>	<i>\$1,748.00</i> <i>(\$437.00)</i>	<i>\$1,573.20</i>	<i>\$368.57</i>	<i>\$1,941.77</i>
Total for ERS (all outside of Puerto Rico)	\$22,072.00	\$17,657.60 (\$4,414.60)	\$15,891.84	\$0.00	\$15,891.84
Total for HTA (all outside of Puerto Rico)	\$232.00	\$185.60 (\$46.40)	\$167.04	\$0.00	\$167.04
Grand Total	\$263,706.75	\$210,965.40 (\$52,741.35)	\$189,868.86	\$9,617.28	\$199,486.12

January 2020 Fee Statement

	Fees	20% Discount	Fees Requested to Be Paid (90%)	Expenses Requested to Be Paid (100%)	Total Fees & Expenses Requested to Be Paid
Total for Commonwealth	\$179,066.25	\$143,253.00 (\$38,813.25)	\$128,927.70	\$8,662.68	\$137,590.38
<i>(a) Services Rendered Outside of Puerto Rico</i>	\$176,018.75	\$140,815.00 (\$35,203.75)	\$126,733.50	\$8,339.98	\$135,073.48
<i>(b) Services Rendered in Puerto Rico</i>	\$3,047.50	\$2,438.00 (\$609.50)	\$2,194.20	\$322.70	\$2,516.90
Total for PREPA (all outside of Puerto Rico)	\$9,328.50	\$7,462.80 (\$1,865.70)	\$6,716.52	\$0.00	\$6,716.52
Total for ERS (all outside of Puerto Rico)	\$17,796.50	\$14,237.20 (\$3,559.30)	\$12,813.48	\$0.00	\$12,813.48
Total for HTA (all outside of Puerto Rico)	\$690.00	\$552.00 (\$138.00)	\$496.80	\$0.00	\$496.80
Grand Total	\$206,881.25	\$165,505.00	\$148,954.50	\$8,662.68	\$157,617.18

SCHEDULE 1

LIST OF PROFESSIONALS BY MATTER

Official Comm. of Unsecured Creditors of Commonwealth of PR (Matter ID 001)

Name	Title or Position	Department, Group, or Section
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Garno, Greg M.	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Friedman, Michael A.	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Gonzalez, Alfredo L.	Partner	Corporate
Castaldi, Angelo M.	Associate	Litigation
Bado, Jean-Pierre	Associate	Litigation
Sadovnic, Irina R.	Associate	Litigation
Jacobs, Eric	Associate	Bankruptcy
Fernandez-Barquin, Juan A.	Associate	Litigation
Hopkins, Colleen	Paralegal	Bankruptcy
Sardina, Jessey	Paralegal	Bankruptcy
Zamora, Johanna	Paralegal	Bankruptcy
Garcia-Montes, Tricia	Paralegal	Litigation
Siff, Steve	Paralegal	Bankruptcy
Esser, Carolyn	Paralegal	Bankruptcy

PREPA (Matter ID 002)

Name	Title or Position	Department, Group, or Section
Genovese, John H.	Partner	Bankruptcy
Arrastia, John	Partner	Litigation
Garno, Greg M.	Partner	Bankruptcy
Day, Allison R.	Partner	Bankruptcy
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Gonzalez, Alfredo L.	Partner	Corporate
Friedman, Michael A.	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Litigation

Sadovnic, Irina R.	Associate	Litigation
Hopkins, Colleen	Paralegal	Bankruptcy
Sardina, Jessey	Paralegal	Bankruptcy
Zamora, Johanna	Paralegal	Bankruptcy

ERS (Matter ID 003)

Name	Title or Position	Department, Group, or Section
Arrastia, John	Partner	Litigation
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Suarez, Jesus M.	Partner	Bankruptcy
Castaldi, Angelo M.	Associate	Bankruptcy
Sadovnic, Irina R.	Associate	Litigation
Zamora, Johana	Paralegal	Bankruptcy
Sardina, Jessey N.	Paralegal	Bankruptcy

HTA (Matter ID 004)

Name	Title or Position	Department, Group, or Section
Gayo-Guitian, Mariaelena	Partner	Bankruptcy
Zamora, Johana	Paralegal	Bankruptcy

Kobra & Kim Report (Matter ID 005)

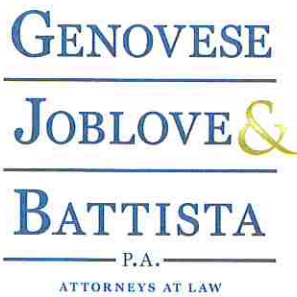
Name	Title or Position	Department, Group, or Section
N/A	N/A	N/A

SCHEDULE 2

**MONTHLY STATEMENTS COVERED IN
APPLICATION**

(attached hereto)

Date	Period Covered	Total Fees	20% Discount	Fees Requested (90%)	Holdback (10%)	Expenses Requested
January 10, 2020	October 1, 2019- October 31, 2019	\$606,059.25	\$484,847.40	\$436,362.66	\$48,484.74	\$7,695.88
March 2, 2020	November 1, 2019- November 30, 2019	\$418,140.50	\$334,512.40	\$301,061.16	\$33,451.24	\$7,321.13
March 2, 2020	December 1, 2019- December 31, 2019	\$263,706.75	\$210,965.54	\$189,868.86	\$21,096.68	\$9,617.26
March 12, 2020	January 1, 2020- January 31, 2020	\$206,881.25	\$165,505.00	\$148,954.50	\$16,550.50	\$8,662.68



January 10, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. October 2019 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s October 2019 Fee Statement (the “October Fee Statement”) for certain services rendered and expenses incurred during the period ending October 31, 2019.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit "A"*** the certification authorizing the submission of the October Fee Statement. Also attached hereto as ***Exhibit "B"*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the October Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$67,563.25)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	96485	\$337,816.25	\$270,253.00	\$243,227.70	\$4,153.17	\$247,380.87

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$49,868.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96486	\$249,344.00	\$199,475.20	\$179,527.68	\$3,515.86	\$183,043.54

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$3,756.80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	96487	\$18,784.00	\$15,027.20	\$13,524.48	\$26.85	\$13,551.33

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$23.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	96488	\$115.00	\$92.00	\$82.80	\$0.00	\$82.80

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$606,059.25 plus costs of \$7,695.88 for a total of \$613,755.13. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in October is equal to \$121,211.85. The costs are \$7,695.88. Accordingly, GJB seeks payment of \$436,362.66 in fees (90% of the total discounted fees) and \$7,695.88 in costs (100% of the costs) as detailed in the October Fee Statement for a total of \$444,058.54.

Any objections you may have to the October Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the October Fee Statement, which is **January 20, 2020** ("Objection Deadline"). If no party serves an objection to the October Fee Statement on GJB and the other Notice Parties attached hereto as ***Exhibit "C"*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$444,058.54 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 067092022

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the October Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,


Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the "Committee") (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.'s September fee statement for certain services rendered and expenses incurred during the period ending October 31, 2019

/s/ Alvin Velazquez

Name	Alvin Velazquez
Company	Service Employees International Union
Dated	January 10, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows

1 I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A , (“GJB” or “Service Provider”) with four offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 (“Miami” or “Main Office”), 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”), Edison Theatre Building, 1533 Hendry Street, Suite 301 Fort Myers, FL 33901 (“Fort Myers”), and 100 N Tampa Street, Suite 2600, Tampa, Florida (“Tampa”) GJB also has an affiliate office in Caracas Venezuela located at Av Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2 The facts set forth in this declaration are based upon my personal knowledge and the firm’s financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3 I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of October 2019,

4 GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134 GJB is not engaged in any trade or business in Puerto Rico

5 GJB’s taxable year ends on December 31 (the “Tax Year”)

6 GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No 6257

7 The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on October 1, 2019 through October 31, 2019, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the “Code”)

1. Commonwealth of Puerto Rico 001 Matter

1 *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$67,563 25)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	96485	\$337,816 25	\$270,253 00	\$243,227 70	\$4,153 17	\$247,380 87

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

1 *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$49,868 80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96486	\$249,344 00	\$199,475 20	\$179,527 68	\$3,515 86	\$183,043 54

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

1 *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$3,756 80)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	96487	\$18,784 00	\$15,027 20	\$13,524 48	\$26 85	\$13,551 33

4. HTA Litigation- 004 Matter

1 *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$23 00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	96488	\$115 00	\$92 00	\$82 80	\$0 00	\$82 80

8 The invoices submitted in connection with the October Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$606,059.25 plus costs of \$7,695.88 for a total of \$613,755.13.

9 That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$121,211.85 (20% discount) The costs are \$7,695.88 Accordingly, GJB seeks payment of \$436,362.66 in fees (90% of the total discounted fees) and \$7,695.88 in costs (100% of the costs) as detailed in the October Fee Statement for a total of \$444,058.54.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 10th day of January 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn. Martin J Bienenstock, Esq
Ehud Barak Esq and

Proskauer Rose LLP,
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Attn Paul V Possinger, Esq

and

O'Neill & Borges LLC
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Attn Hermann D Bauer, Esq

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

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Carolina Velaz-Rivero Esq

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One East Main Street, Suite 500
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Attn Katherine Stadler, Esq

and

EDGE Legal Strategies, PSG
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00918
Attn. Eyck O. Luge

U.S Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re *In re Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

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New York, NY 10022
Attn. Robert Gordon, Esq
Richard Levin, Esq

and

Jenner & Block LLP
353 N Clark Street
Chicago, IL 60654
Attn Catherine Steege, Esq
Melissa Root, Esq

and

Bennazar, Garcia & Milian, C S.P
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn A.J Bennazar-Zequeira, Esq

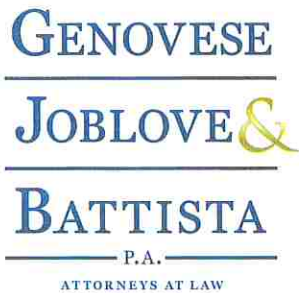
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



March 2, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. November 2019 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s November 2019 Fee Statement (the “November Fee Statement”) for certain services rendered and expenses incurred during the period ending November 30, 2019.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

Further, in accordance with the Interim Compensation Order, please see attached as **Exhibit "A"** the certification authorizing the submission of the November Fee Statement. Also attached hereto as **Exhibit "B"** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the November Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$61,100.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	96724	\$305,501.50	\$244,401.20	\$219,961.08	\$7,233.83	\$227,194.91

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,477.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96725	\$92,388.00	\$73,910.40	\$66,519.36	\$57.30	\$66,576.66

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,050.20)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	96726	\$20,251.00	\$16,200.80	\$14,580.72	\$30.00	\$14,610.72

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$418,140.50 plus costs of \$7,321.13 for a total of \$425,461.63. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in November is equal to \$83,628.10. The costs are \$7,321.13. Accordingly, GJB seeks payment of \$301,061.16 in fees (90% of the total discounted fees) and \$7,321.13 in costs (100% of the costs) as detailed in the November Fee Statement for a total of \$308,382.29.

Any objections you may have to the November Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the November Fee Statement, which is **March 12, 2020** ("Objection Deadline"). If no party serves an objection to the November Statement on GJB and the other Notice Parties attached hereto as ***Exhibit "C"*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$308,382.29 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 067092022

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the November Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,



Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s November fee statement for certain services rendered and expenses incurred during the period ending November 30, 2019.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International Union
Dated: March 2, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., (“GJB” or “Service Provider”) with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 (“Miami” or “Main Office”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”) and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm’s financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of November 2019;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB’s taxable year ends on December 31 (the “Tax Year”).

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on November 1, 2019 through November 31, 2019, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the “Code”):

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$61,100.30)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	96724	\$305,501.50	\$244,401.20	\$219,961.08	\$7,233.83	\$227,194.91

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$18,477.60)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96725	\$92,388.00	\$73,910.40	\$66,519.36	\$57.30	\$66,576.66

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

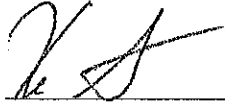
Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,050.20)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	96726	\$20,251.00	\$16,200.80	\$14,580.72	\$30.00	\$14,610.72

8. The invoices submitted in connection with the November Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$418,140.50 plus costs of \$7,321.13 for a total of \$425,461.63.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$83,628.10 (20% discount). The costs are \$7,321.13. Accordingly, GJB seeks payment of \$301,061.16 in fees (90% of the total discounted fees) and \$7,321.13 in costs (100% of the costs) as detailed in the

November Fee Statement for a total of \$308,382.29.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 2nd day of March 2020, in Miami, Florida.

A handwritten signature in black ink, appearing to be 'Ken Forrest', written over a horizontal line.

KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
LLC MCS Plaza, Suite 500
255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
200 Park Avenue
New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
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53 Palmeras Street, Ste. 1601
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Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
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Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
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00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
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Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequiera, Esq.

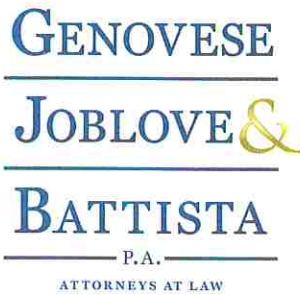
Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury



March 2, 2020

Via Electronic Mail

The Commonwealth of Puerto Rico
Puerto Rico Fiscal Agency and Financial Advisory Authority
c/o O'Melveny & Myers, LLP
Time Square Tower
7 Times Square
New York, NY 10036

Attn: John J. Rapisardi, Esq., Suzanne Uhland, Esq., Peter Friedman, Esq. and Diana M. Perez, Esq.

**Re: *In re Commonwealth of Puerto Rico, et al.* Case No. 17-BK-3283 (LTS)
(Jointly Administered) –
Genovese, Joblove & Battista, P.A. December 2019 Fee Statement**

Dear Mr. Rapisardi, Ms. Uhland, Mr. Friedman, and Ms. Perez:

By order entered May 31, 2019 (the “Retention Order”), the U.S. District Court for the District of Puerto Rico authorized the employment and retention of Genovese, Joblove & Battista, P.A. (“GJB”) as special litigation counsel to the Official Committee of Unsecured Creditors.

In accordance with the second interim compensation order, dated June 6, 2018 (the “Interim Compensation Order”) please find enclosed copies of GJB’s December 2019 Fee Statement (the “December Fee Statement”) for certain services rendered and expenses incurred during the period ending December 30, 2019.

In accordance with the Interim Compensation Order, I hereby certify that no public servant of the Department of Treasury and no employee of the Puerto Rico Highways and Transportation Authority, the Employees Retirement Systems of the Government of the Commonwealth of Puerto Rico, or the Puerto Rico Electric Power Authority is a party to or has any interest in the gains or benefits derived from the contract that is the basis of this invoice. The only consideration for providing services under the contract is the payment agreed upon with the Committee.¹ The amount shown on the attached invoices is reasonable. The services were rendered and the corresponding payment has not been made. To the best of my knowledge, GJB does not have any debts owed to the Government of Puerto Rico or its instrumentalities.

¹ For the avoidance of doubt, in accordance with the Retention Order, the Debtors are responsible for the compensation of GJB’s fees and reimbursement of its expenses, and under no circumstances are the Committee members responsible for payment of GJB’s fees and expenses.

Further, in accordance with the Interim Compensation Order, please see attached as ***Exhibit "A"*** the certification authorizing the submission of the December Fee Statement. Also attached hereto as ***Exhibit "B"*** is the related Declaration regarding fees and expenses related to the activities undertaken in Puerto Rico vs. outside of Puerto Rico.

A summary of the breakdown of fees and expenses in the December Fee Statement is provided below for your ease of reference.

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$39,307.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	96953	\$196,535.50	\$157,228.40	\$141,505.56	\$8,191.43	\$149,696.99

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$8,536.45)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96954	\$42,682.25	\$34,145.80	\$30,731.22	\$1,057.26	\$31,788.48

ii. *Services rendered inside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$437.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96954	\$2,185.00	\$1,748.00	\$1,573.20	\$368.57	\$1,941.77

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,414.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	96955	\$22,072.00	\$17,657.60	\$15,891.84	\$0.00	\$15,891.84

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$46.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	96956	\$232.00	\$185.60	\$167.04	\$0.00	\$167.04

Under the Retention Order (¶2, page 2), GJB agreed to reduce its regular hourly rates by twenty (20%) percent. The attached invoices reflect the full amount billed by GJB for fees in the amount of \$263,706.75 plus costs of \$9,617.26 for a total of \$273,324.01. The travel times that appear on the invoice have been adjusted to fifty (50%) percent of the billing rate. The twenty (20%) percent discount applied to fees in December is equal to \$52,741.35. The costs are \$9,617.26. Accordingly, GJB seeks payment of \$189,868.86 in fees (90% of the total discounted fees) and \$9,617.26 in costs (100% of the costs) as detailed in the December Fee Statement for a total of \$199,486.12.

Any objections you may have to the December Fee Statement should be served on GJB and the other Notice Parties so as to be received on or before 4:00 pm (Atlantic Standard Time) on the 10th day (or the next business day if such day is not a business day) following service of the December Fee Statement, which is **March 12, 2020** ("Objection Deadline"). If no party serves an objection to the December Statement on GJB and the other Notice Parties attached hereto as ***Exhibit "C"*** so as to be received by the Objection Deadline, GJB respectfully requests payment of \$199,486.12 to the following account:

Wiring and ACH Instructions:

Beneficiary Bank : First Citizens Bank

ABA Number : 067092022

Swift Code : FCBTUS33 (optional)

Account Number: 9063688157

Account Name : Genovese Joblove & Battista, P.A. – Operating Account

Bank Telephone #: 305-447-5050

Bank Address: 3121 Commodore Plaza, Coconut Grove, Florida 33133

If an objection is timely served with respect to the December Fee Statement, GJB requests payment of 90% of the requested fees and 100% of the requested costs that are not subject to such Objection, in accordance with the Interim Compensation Order.

Please let me know if you have any questions regarding any of the foregoing.

Sincerely,



Mariaelena Gayo-Guitian, Esq.

Exhibit A

Certification

PRINCIPAL CERTIFICATION

I, Alvin Velazquez, on behalf of the Service Employees International Union, solely in its capacity as a member of the Official Committee of Unsecured Creditors of the Title III Debtors (other than COFINA) (the “Committee”) (and not in its individual capacity), hereby certify that the Committee has approved Genovese Joblove & Battista, P.A.’s December fee statement for certain services rendered and expenses incurred during the period ending December 31, 2019.

/s/ Alvin Velazquez

Name: Alvin Velazquez
Company: Service Employees International Union
Dated: March 2, 2020

Exhibit B

Tax Declaration

DECLARATION

I, Ken Forrest, hereby declare, under penalty of perjury as follows:

1. I am of legal age, a resident of the United States and Chief Financial Officer of Genovese, Joblove & Battista, P.A., (“GJB” or “Service Provider”) with offices in Florida located at 100 Southeast Second Street, 44th Floor, Miami, Florida 33131 (“Miami” or “Main Office”); 200 East Broward Boulevard, Suite 1110, Fort Lauderdale, Florida 33301 (“Ft. Lauderdale”) and 100 N. Tampa Street, Suite 2600, Tampa, Florida (“Tampa”). GJB also has an affiliate office in Caracas Venezuela located at Av. Francisco de Miranda, Torre Provincial "A" piso 8 oficina 81 y 82 1060 Caracas, Venezuela.

2. The facts set forth in this declaration are based upon my personal knowledge and the firm’s financial records that were reviewed by me or other GJB employees acting under my supervision and direction

3. I submit this declaration in support of the Monthly Fee Statement submitted for payment by GJB for the month of December 2019;

4. GJB is a professional association organized under the laws of the State of Florida in the United States with Employer ID 65-0518134. GJB is not engaged in any trade or business in Puerto Rico.

5. GJB’s taxable year ends on December 31 (the “Tax Year”).

6. GJB does not have an office or other fixed place of business within Puerto Rico, as described under Puerto Rico Treasury Regulation No. 6257.

7. The following fees and expenses relate to activities undertaken outside of Puerto Rico by the Service Provider as part of the PROMESA Title III proceedings during the fee period beginning on December 1, 2019 through December 31, 2019, which constitute gross income from sources outside Puerto Rico pursuant to the Puerto Rico Internal Revenue Code of 2011, as amended (the “Code”):

1. Commonwealth of Puerto Rico 001 Matter

i. *Services rendered outside of Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$39,307.10)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-001	Promesa Special Conflicts Counsel	96953	\$196,535.50	\$157,228.40	\$141,505.56	\$8,191.43	\$149,696.99

2. Puerto Rico Electric Power Authority ("PREPA") 002 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$8,536.45)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96954	\$42,682.25	\$34,145.80	\$30,731.22	\$1,057.26	\$31,788.48

ii. *Services rendered inside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$437.00)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-002	PREPA Adversary	96954	\$2,185.00	\$1,748.00	\$1,573.20	\$368.57	\$1,941.77

3. Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") 003 Matter

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$4,414.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-003	ERS Litigation	96955	\$22,072.00	\$17,657.60	\$15,891.84	\$0.00	\$15,891.84

4. **HTA Litigation- 004 Matter**

i. *Services rendered outside Puerto Rico*

Matter	Matter Name	Invoice Number	Fees	20% Discount (\$46.40)	Fees Requested to be Paid (90%)	Expenses Requested to be Paid (100%)	Fees & Expenses Requested to be Paid
12272-004	HTA Litigation	96956	\$232.00	\$185.60	\$167.04	\$0.00	\$167.04

8. The invoices submitted in connection with the December Fee Statement and summarized above reflect the full amount billed by GJB for fees in the amount of \$263,706.75 plus costs of \$9,617.26 for a total of \$273,324.01.

9. That under the GJB's retention order in the Title III cases, GJB agreed to a voluntary 20% reduction in its hourly fees sought to be paid in the amount of \$52,741.35 (20% discount). The costs are \$9,617.26. Accordingly, GJB seeks payment of \$189,868.86 in fees (90% of the total discounted fees) and \$9,617.26 in costs (100% of the costs) as detailed in the December Fee Statement for a total of \$199,486.12.

IN WITNESS WHEREOF, I hereby declare, under penalty of perjury, that the above statement is true and correct on this 2nd day of March 2020, in Miami, Florida.



KEN FORREST

Exhibit C

Notice Parties

Counsel for the Oversight Board

Proskauer Rose LLP
Eleven Times Square
New York, NY
10036
Attn: Martin J. Bienenstock, Esq.
Ehud Barak Esq. and

Proskauer Rose LLP,
70 West Madison
Street, Chicago, IL
60602
Attn: Paul V. Possinger, Esq.

and

O'Neill & Borges LLC
250 Mulioz Rivera Ave., Suite 800
San Juan, PR 00918
Attn: Hermann D. Bauer, Esq.

Counsel for the Puerto Rico Fiscal Agency and Financial Advisory Authority

Marini Pietrantonio Muniz
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255 Ponce de León Ave
San Juan, PR 00917
Attn: Luis C. Marini-Biaggi, Esq.
Carolina Velaz-Rivero Esq.

The Office of the United States Trustee for the District of Puerto Rico

Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, Puerto Rico 00901 (re: In Commonwealth of Puerto Rico)

Counsel for the Official Committee of Unsecured Creditors

Paul Hastings
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New York, NY 10166
Attn: Luc A. Despina, Esq.

Counsel for the Official Committee of Unsecured Creditors

Casillas, Santiago & Torres, LLC
El Caribe office Building
53 Palmeras Street, Ste. 1601
San Juan, Puerto Rico 00901
Attn: Juan J . Casillas Ayala, Esq.
Alberto J.E. Aneses Negron, Esq.

Counsel for the Fee Examiner

Godfrey & Kahn S.C.
One East Main Street, Suite 500
Madison, Wisconsin 53703-3300
Attn: Katherine Stadler, Esq.

and

EDGE Legal Strategies, PSG
252 Ponce de Le6n
Avenue Citibank Tower,
12th Floor San Juan, PR
00918
Attn: Eyck O. Luge

U.S. Trustee

Office of the United States Trustee for the District of Puerto Rico
Edificio Ochoa
500 Tanca Street, Suite 301
San Juan, PR 00901 (re: *In re: Commonwealth of Puerto Rico*)

Counsel for the Official Committee of Retired Employees

Jenner & Block LLP
919 Third Ave.
New York, NY 10022
Attn: Robert Gordon, Esq.
Richard Levin, Esq.

and

Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654
Attn: Catherine Steege, Esq.
Melissa Root, Esq.

and

Bennazar, Garcia & Milian, C.S.P.
Edificio Union Plaza, PH-A,
416 Ave. Ponce de Leon
Hate Rey, PR 00918
Attn: A.J. Bennazar-Zequeira, Esq.

Puerto Rico Department of Treasury

Puerto Rico Department of
Treasury

PO Box 9024140

San Juan, PR 00902-4140

Attn: Reylam Guerra Goderich, Deputy Assistant of Central Accounting
Omar E. Rodriguez Perez, CPA, Assistant Secretary of Central Accounting
Angel L. Pantoja Rodriguez, Deputy Assistant Secretary of Internal Revenue and Tax
Policy
Francisco Pares Alicea, Assistant Secretary of Internal Revenue and Tax Policy
Francisco Pefia Montanez, CPA, Assistant Secretary of the Treasury

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019
Please Refer to
Invoice Number: 96485

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Oct 31, 2019

337,816.25

Costs incurred and advanced

4,153.17

Current Fees and Costs Due

341,969.42

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019

Please Refer to

Invoice Number: 96485

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Oct 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
10/01/19	MGG	Email to and from Johana Zamora re: excel spreadsheet with listing of pending adversary cases (.20). Review and analyze same (.50).	0.70	575.00	402.50
10/01/19	IRS	Review case management orders relating to omnibus hearing procedures.	0.40	350.00	140.00
10/02/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/03/19	JZ	Review of deadline calendar; circulate e-mail listing upcoming deadlines.	0.30	195.00	58.50
10/03/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/03/19	JZ	Conference with J. Sardina regarding expiration of tolling agreements and the deadline management on same.	0.30	195.00	58.50
10/03/19	JNS	Strategize with J. Zamora regarding management of tolling agreements.	0.30	75.00	22.50
10/04/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/07/19	MGG	Strategize with J. Zamora regarding master adversary trading sheet.	0.30	575.00	172.50
10/07/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/07/19	JZ	Conference with M. Guitan regarding adding additional categorization columns to the master excel sheet and preparation of key.	0.30	195.00	58.50
10/08/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50

PROMESA - Official Committee of Unsecured Creditors
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10/09/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
10/10/19	JZ	Conference with J. Sardina regarding upcoming tolling deadlines.	0.20	195.00	39.00
10/11/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/14/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/15/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
10/17/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/18/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
10/21/19	JA	Review committee correspondence.	0.30	575.00	172.50
10/21/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/22/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/22/19	JZ	Attention to tolling agreement deadlines (.2); conference with J. Sardina to obtain chart listing all continued deadlines (.1).	0.30	195.00	58.50
10/22/19	JNS	Confer with J. Zamora regarding continued deadlines.	0.10	75.00	7.50
10/22/19	JZ	Conference with S. Siff to discuss case management procedures in the Walmart adversary case and deadline management.	0.40	195.00	78.00
10/23/19	JA	Confer with Committee.	0.50	575.00	287.50
10/23/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
10/24/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/25/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
10/28/19	MGG	Review Doc No. 9016 - copy of Order Extending the Mediation Stay and related deadlines. Confirm scheduling of new dates.	0.30	575.00	172.50
10/28/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/29/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50

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10/29/19	JZ	Receipt and review of the Agenda for the Omnibus hearing on October 30-31 filed by Proskauer; update electronic case profile.	0.20	195.00	39.00
10/30/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/31/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
Subtotal: B110 / Case Administration			10.30		\$2,820.50
B113 / Pleadings Review					
10/01/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late September 27 through September 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.80	195.00	546.00
10/01/19	SS	Prepare digest of matters and filings from Late September 27 through September 30 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/01/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from October 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/01/19	SS	Prepare digest of matters and filings from October 1 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/02/19	SS	Prepare digest of matters and filings relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/02/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from October 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/02/19	SS	Prepare digest of matters and filings on October 2 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
10/02/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from Late October 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/03/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings and filings from late October 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/03/19	SS	Prepare digest of matters and filings fro, late on October 2 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50

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10/03/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from October 3 in order to d prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/03/19	SS	Prepare digest of matters and filings on October 3 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/04/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late October 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/04/19	SS	Prepare digest of matter and filings from late October 3 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/04/19	SS	Prepare digest of matters and filings from October 4 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
10/04/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from October 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/05/19	SS	Began to Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.50	195.00	97.50
10/07/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late October 4 through October 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
10/07/19	SS	Prepare digest of matters and filings from late October 4 through October 6 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/07/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on October 7 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.00	195.00	390.00
10/07/19	SS	Prepare digest of matters and Filings on October 7 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/08/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late October 7 and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00

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10/08/19	SS	Prepare digest of matters and filings from late October 7 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
10/08/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 8 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/08/19	SS	Prepare digest of matters and filings on October 8 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
10/10/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 8 and October 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/10/19	SS	Prepare digest of matters and filings from late October 8 and October 9 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/10/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/10/19	SS	Prepare digest of matters and filings on October 10 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
10/11/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/11/19	SS	Prepare digest of matters and filings from late October 10 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
10/11/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/11/19	SS	Prepare digest of matters and filings on October 11 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
10/14/19	SS	Review and Analyze all court filings for late October 11 through October 23 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/14/19	SS	Prepare digest of matters and filings from Late October 11 through October 13 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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10/14/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from October 14 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/14/19	SS	Prepare digest of matters and filings from October 14 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/15/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 14 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
10/15/19	SS	Prepare digest of matters and filings from late October 14 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/15/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from October 15 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/15/19	SS	Prepare digest of matters and filings on October 15 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/16/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 15 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/16/19	SS	Prepare digest of matters and filings from late October 15 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/16/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 16 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/16/19	SS	Prepare digest of matters and filings on October 16 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/17/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 16 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/17/19	SS	Prepare digest of matters and filings from late October 16 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/17/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings filed on October 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00

PROMESA - Official Committee of Unsecured Creditors
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10/17/19	SS	Prepare digest of matters and filings from October 17 relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/18/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/18/19	SS	Prepare digest of matters and filings from late October 17 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
10/18/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/18/19	SS	Prepare digest of matters and filings on October 18 relevant to special litigation counsel and distribute to appropriate team members.	0.60	195.00	117.00
10/21/19	SS	Prepare digest of matters and filings from late October 18 through October 20 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/21/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 21 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/21/19	SS	Prepare digest of matters and filings on October 21 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
10/21/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from Late October 18 through October 20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/22/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 21 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/22/19	SS	Prepare digest of matters and filings from late October 21 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/22/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/22/19	SS	Prepare digest of matters and filings from October 22 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50

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10/23/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late on October 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/23/19	SS	Prepare digest of matters and filings from late October 22 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/23/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on October 23 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/23/19	SS	Prepare digest of matters and filings on October 23 relevant to special litigation counsel and distribute to appropriate team members.	0.70	195.00	136.50
10/25/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings from late October 23 through October 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/25/19	SS	Prepare digest of matters and filings from late October 23 through October 24 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/25/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on October 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
10/25/19	SS	Prepare digest of matters and filings on October 25 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
10/28/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings form late October 25 through October 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
10/28/19	SS	Prepare digest of matters and filings from late October 25 through October 27 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/28/19	SS	Review and Analyze all court filings in the Main Case , Title III cases and Adversary Proceedings on October 28 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
10/28/19	SS	Prepare digest of matters and filings on October 28 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00

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10/29/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 28 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/29/19	SS	Prepare digest of matters and filings from late October 28 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/29/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 29 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
10/29/19	SS	Prepare digest of matters and filings on October 29 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/30/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 29 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
10/30/19	SS	Prepare digest of matters and filings from late October 29 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
10/30/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
10/30/19	SS	Prepare digest of matters and filings on October 30 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
10/31/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on October 31 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
10/31/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late October 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
10/31/19	SS	Prepare digest of matters and filings from late October 30 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
10/31/19	SS	Prepare digest of matters and filings on October 31 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
Subtotal: B113 / Pleadings Review			127.80		\$24,921.00

B150 / Meetings of Creditors

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10/23/19	JA	Confer with Committee Chair regarding litigation status issues (.3); prepare status update to Committee (.4); call with Committee (.4).	1.10	575.00	632.50
10/24/19	JA	Prepare materials for conference with Committee Chair (.5); confer with Committee Chair (.6).	1.10	575.00	632.50
10/29/19	JA	Prepare for Committee call (.3); attend and present at Committee call (.5)	0.80	575.00	460.00
Subtotal: B150 / Meetings of Creditors			3.00		\$1,725.00
B160 / Fee/Employment Applications					
10/01/19	MGG	Finalize review of August bills (.60). Outline comments to August bills (.30). Telephone conference with J. Arrastia re: August Bills. (.20).	1.10	575.00	632.50
10/01/19	MGG	Meeting with C. Hopkins re: billing and task codes.	0.50	575.00	287.50
10/01/19	JA	Conference with M. Guitian re: August bills.	0.20	575.00	115.00
10/01/19	CBH	Review of bankruptcy billing task codes; meeting and e-mail correspondence with M. Guitian regarding same.	0.50	195.00	97.50
10/02/19	MGG	Outline comments to August bills and send e-mail to John Arrastia with same.	0.50	575.00	287.50
10/02/19	JA	Finalize fee statements, reviewing for confirmity with Fee Examiner specifications (1.1); review comments from M. Guitian (.3) and prepare response and comments (.1).	1.50	575.00	862.50
10/03/19	MGG	Receipt and review email from John Arrastia re: PROMESA bills (.10) Review and finalize bills (.60).	0.70	575.00	402.50
10/09/19	JA	Review and revise fee statement drafts for August.	0.90	575.00	517.50
10/10/19	MGG	Receipt and review email from Ken Forrest with copy of August invoice and summary.	0.40	575.00	230.00
10/10/19	MGG	Prepare Monthly Fee Objection letter and corresponding email for service of Letter on Notice Parties (.4); meet with C. Esser (.3); interoffice meeting with C. Hopkins re: monthly fee statement (.3).	1.00	575.00	575.00
10/10/19	CE	Review August invoices (.3); Preparation of August Monthly Fee Statement (.4); Interoffice meeting with M. Guitian (.3).	1.00	150.00	150.00
10/11/19	MGG	Preliminary review of September invoices.	0.50	575.00	287.50
10/14/19	MGG	Review August invoices and prepare draft email to Committee with outline of fees for review and comment.	0.70	575.00	402.50
10/14/19	JA	Prepare and revise fee statements for August.	1.20	575.00	690.00

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10/15/19	MGG	Review email from accounting with September prebills (.50). Email to Committee with August Invoices and November Budget for review and approval. (.50).	1.00	575.00	575.00
10/17/19	MGG	Review and revise September invoices.	0.40	575.00	230.00
10/18/19	MGG	Receipt and review letter from Fee Examiner with comments re: GJB's First Interim Fee Application (.50). Emails to John Arrastia re: same (.10).	0.60	575.00	345.00
10/18/19	MGG	Conference with C. Hopkins re: preparation of 2nd Interim Fee Application.	0.40	575.00	230.00
10/18/19	CBH	Conference with M. Guitian re: preparation of 2nd Interim Fee Application (.4); begin preparation (.1).	0.50	195.00	97.50
10/21/19	JA	Analyze correspondence from fee examiner (.8); prepare response to examiner (.8).	1.60	575.00	920.00
10/21/19	CBH	Continue preparation of second interim fee application.	0.80	195.00	156.00
10/22/19	JA	Review, analyze and prepare September statements in conformity with fee examiner requirements.	1.20	575.00	690.00
10/24/19	MGG	Receipt and review Doc No. 8934 - Fee Examiner's report on uncontested professional fee matters for consideration in Connection with the October 30, 2019 Omnibus Hearing (.30). Review attachments re: GJB adjustments. Circulate to John Arrastia (.10). Correspondence with John Arrastia re: Fee Examiners report (.30).	0.70	575.00	402.50
10/24/19	CBH	Continue preparation of second interim fee application; e-mail correspondence with M. Guitian regarding outstanding invoices.	0.80	195.00	156.00
10/25/19	MGG	Meeting with C. Hopkins re: Second Interim Fee application and deadlines.	0.40	575.00	230.00
10/25/19	CBH	Continue preparation of fee application (.6); meeting with M. Guitian regarding dates of application and deadline to file (.4); attention to invoice statements for June and July 2019 to add information to application (.4).	1.40	195.00	273.00
10/28/19	MGG	Review amounts and prepare e-mail to Creditors Committee for approval of GJB September Invoices.	0.50	575.00	287.50
10/28/19	MGG	Confer with accounting re; holdbacks and summary thereof for inclusion in Second Interim Fee Application.	0.50	575.00	287.50
10/28/19	CBH	Attention to preparation of second interim fee application (.4); review of invoices for June and July; e-mail correspondence with accounting regarding same (.4); attention to copies of monthly budgets for exhibits (.4); continue preparation of exhibits (.5).	1.60	195.00	312.00
10/29/19	MGG	Email to and from John Arrastia and Jesus Suarez re: approval of August and September invoices by Committee.	0.30	575.00	172.50

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10/29/19	JA	Correspondence with M. Guitian re: invoices.	0.20	575.00	115.00
10/30/19	MGG	Review Omnibus Order Awarding Interim Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses for the Sixth Compensation Period From February 1, 2019 through May 31, 2019 and approval of GJB's fees. Office conference with accounting re: adjustment to billing matters.	0.40	575.00	230.00
10/30/19	MGG	Review email from John Arrastia with update on approval of GJB Fees for August 2019.	0.20	575.00	115.00
10/30/19	CBH	Continue preparation of second interim fee application (.4); attention to billing reports; meeting with L. Rice regarding same (.5); attention to bill and payment report (.2); preparation of expense exhibits (.6).	1.70	195.00	331.50
10/31/19	CBH	Continue preparation of second interim fee application (.5); continue preparation of exhibits (1.0); edits to declaration of J. Genovese (.5); addition of case background (.2).	2.20	195.00	429.00
Subtotal: B160 / Fee/Employment Applications			28.10		\$12,122.50
B161 / Budgeting					
10/14/19	JHG	Review October revised litigation budget.	0.80	765.00	612.00
10/14/19	JA	Prepare November budget after examining pending case issues, tasks underway, and project forecasts (1.3); review comments from M. Guitian (.1).	1.40	575.00	805.00
10/14/19	MGG	Review proposed November Budget (.30). Email comments to John Arrastia (.20).	0.50	575.00	287.50
10/22/19	JHG	Review and analysis of proposed reply, cases cited and arguments made.	3.40	765.00	2,601.00
10/31/19	JHG	Review and analysis of ECF 1699 fourth joint informative motion.	0.40	765.00	306.00
Subtotal: B161 / Budgeting			6.50		\$4,611.50
B165 / Fee-Employment Other Professionals					
10/17/19	TG	Prepare communication to John Wilkinson (@Trustpoint.One) re: follow-up to TP1's invoicing error (July & Aug, 2019).	0.20	120.00	24.00
10/17/19	TG	Prepare communication to lead GJB counsel re: attached corrected invoice (September, 2019) from Trustpoint.One for approval and payment.	0.10	120.00	12.00
Subtotal: B165 / Fee-Employment Other Professionals			0.30		\$36.00
B180 / Avoidance Action Analysis					
10/29/19	SS	Fuel Ilne litigation: met with AC to provide comments on Amended Complaint. Reviewed same.	1.20	195.00	234.00

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Subtotal: B180 / Avoidance Action Analysis			1.20		\$234.00
B190 / Other Contested Matters					
10/02/19	AMC	Review and analyze disclosure statement filed by the Oversight Board and other participating parties	3.40	375.00	1,275.00
10/21/19	JA	Review Joint Motion to Modify Order Regarding Stay and Mandatory Mediation.	0.20	575.00	115.00
10/22/19	MGG	Review Doc No. 8916-Objection of UBS Financial Services Incorporated of Puerto Rico, to the Urgent Joint Motion to Modify Order Regarding Stay and Mandatory Mediation With Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Doc No. 8899, the "Scheduling Motion").	0.30	575.00	172.50
10/25/19	JA	Confer with Rosa Sierra of SCC regarding vendor action dismissal recommendations (.2); review analysis of DGC relating to recommendation (.3); conduct due diligence (.3)	0.80	575.00	460.00
10/28/19	JHG	Review email from Alex Bongartz and analysis of impact on mediation process.	0.90	765.00	688.50
Subtotal: B190 / Other Contested Matters			5.60		\$2,711.00
B191 / General Litigation					
10/01/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (total 2500 documents) (Docs 801 - 866).	3.30	565.00	1,864.50
10/01/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 867 - 933).	3.20	565.00	1,808.00
10/01/19	MGG	Review and track filings of Motions for Leave to File Amended Complaints related to the following adversaries: 19-00281, 19-00282; 19-00283; and 19-00356. (.40). Review Notice of Voluntary Dismissal in connection with the following Adversary cases : 19-00357 as to: Janney Montgomery Scott LLC, Lazard Cap Mkts LLC, Mesirow Financial, Mitsubishi UFJ Trust & Banking Corporation, PNC Bank, National Association, RBC Dominion Securities Inc./CDS**, Sanford C. Bernstein & Co., LLC, Stockcross Financial Services, Inc., TD Prime Services LLC, The Bank Of New York Mellon, The Bank Of New York Mellon/FMS Bonds, Inc., The Bank Of New York Mellon/Mellon Trust of New England National Association, The Bank Of New York Mellon/Nomura Bank Int'l PLC, The Bank Of New York/Popular Securities, Inc. and USAA Investment Management Company. (.30).	0.70	575.00	402.50
10/01/19	JMS	Attention to revisions to underwriter Complaint and related amendments (2.9); review issues relating to tolled parties (1.7)	4.60	500.00	2,300.00

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10/01/19	MAF	Emails with J Suarez, JP Bado concerning distinctions in PROMESA proceeding and implications regarding motion to stay as to third party litigation (0.3)	0.30	550.00	165.00
10/01/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 1 (55 Documents).	3.60	465.00	1,674.00
10/01/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 2 (33 Documents).	2.10	465.00	976.50
10/01/19	JPB	Legal research and analysis of relief under section 105(a) of the Bankruptcy code in anticipation of drafting Motion for Stay (19-00422). Analyzed case law in federal circuit (3.9) and bankruptcy courts (3.4) to assess implications of third party litigation.	7.30	375.00	2,737.50
10/01/19	JPB	Prepare and revise memorandum outlining potential strengths and weaknesses of potential options regarding response to Monoline removal and complaint and impact on UCC claim (19-00422).	2.20	375.00	825.00
10/01/19	JPB	Strategize potential arguments and counter-arguments in anticipation of potential response to Monoline removal and complaint and impact on UCC claims (19-00422).	1.10	375.00	412.50
10/01/19	IRS	Review daily docket entry updates from S. Siff.	0.30	350.00	105.00
10/01/19	IRS	Conduct legal research and analysis regarding response in opposition to Walmart's motion to dismiss.	1.80	350.00	630.00
10/01/19	IRS	Review legal analysis regarding options relating to Monoline complaint.	0.60	350.00	210.00
10/01/19	IRS	Strategize regarding available options related to the Monoline complaint.	0.40	350.00	140.00
10/02/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 934 - 944)	1.30	565.00	734.50
10/02/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 945 - 1120).	2.40	565.00	1,356.00
10/02/19	JA	Review and analyze outline of issues relating to potential options to Monoline complaint and removal.	1.30	575.00	747.50
10/02/19	MGG	Review Doc No. 8797 - Order Clarifying Effect of Prior Orders and Establishing Notice and Objection Procedures Regarding Disclosure of Confidential Information (.20). Evaluate impact on disclosures of defendants on pending litigation (.30).	0.50	575.00	287.50
10/02/19	JA	Review and address various tolling agreements (.2) and orders on leave to amend (.1).	0.30	575.00	172.50
10/02/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 3 (32 Documents).	1.90	465.00	883.50

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10/02/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 4 (42 Documents).	3.40	465.00	1,581.00
10/02/19	JPB	Develop outline of factual allegations in support of potential response to Monoline complaint (19-00422). Analyze outline of facts regarding proposed issuances (3.3) and revise proposed allegations against broker dealer defendants (2.1).	5.40	375.00	2,025.00
10/02/19	EJ	Conduct legal research on First Circuit case law on appeals of possible orders that could be anticipated in confirmation proceedings.	2.70	475.00	1,282.50
10/02/19	IRS	Conduct legal research and analysis regarding possible defenses relating to Walmart claims.	1.50	350.00	525.00
10/02/19	IRS	Prepare response in opposition to Walmart's Motion to Dismiss.	1.30	350.00	455.00
10/02/19	SS	Reviewed and analyzed database documents for Kobre and Kim, Batch SS1, Tranche 26 (298 documents)	2.80	195.00	546.00
10/02/19	JZ	Receipt and review of Order Granting Urgent motion for Leave to File Amended Adversary Complaint in the BNY Mellon matter (19-282); circulate same; update electronic case profile.	0.20	195.00	39.00
10/02/19	JZ	Receipt and review of Order Granting Urgent motion for Leave to File Amended Adversary Complaint in the IL matter (19-283); circulate same; update electronic case profile.	0.20	195.00	39.00
10/02/19	JZ	Receipt and review of Order Granting Urgent motion for Leave to File Amended Adversary Complaint in the I-M matter (19-356); circulate same; update electronic case profile.	0.20	195.00	39.00
10/02/19	JZ	Receipt and review of Order Granting Urgent motion for Leave to File Amended Adversary Complaint in the Jefferies matter (19-281); circulate same; update electronic case profile.	0.20	195.00	39.00
10/03/19	JHG	Review daily summary prepared by S. Siff of filings to analyze any strategic litigation issues.	0.80	765.00	612.00
10/03/19	JHG	Review ECF 7890 and PREPA 1665 regarding protective order on Orley deposition.	1.30	765.00	994.50
10/03/19	JHG	Review motions for extension, ECF 35, 36, 37 and 38 in adversary 19-00283 (.4); Review case file ECF 3919-00283 regarding case strategy and options (.7).	1.10	765.00	841.50
10/03/19	JHG	Review ECF 8806.	0.10	765.00	76.50
10/03/19	JHG	Review ECF 8809.	0.10	765.00	76.50
10/03/19	JHG	Review amended notice of appeal.	0.90	765.00	688.50

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10/03/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1021 - 1040)	1.20	565.00	678.00
10/03/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1041 - 1134)	2.30	565.00	1,299.50
10/03/19	JMS	Review Wal-Mart claim and continued attention to litigation strategy (1.8); review issues concerning proposed amendments to underwriter complaint and CITI analysis (2.3).	4.10	500.00	2,050.00
10/03/19	JA	Strategize regarding Monoline Intervention and and prepare approach to analysis and prospective opposition.	1.60	575.00	920.00
10/03/19	JA	Review draft Opposition to Walmart Motion to Dismiss (.4).	0.40	575.00	230.00
10/03/19	MAF	Walmart: review of motion to dismiss response draft and consider potential revisions to the same (1.0) Conference with E Jacobs regarding research issues surrounding potential appellate issues in 9019 settlement order context (0.5).	1.50	550.00	825.00
10/03/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 2 (30 documents).	2.90	375.00	1,087.50
10/03/19	JAF	Conduct research and analysis of Long Island Power Authority and said entities relationship to PREPA, for purposes of conducting review of Kobre and Kim database documents.	0.30	465.00	139.50
10/03/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 6 (56 Documents).	2.70	465.00	1,255.50
10/03/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 5 (41 Documents).	2.20	465.00	1,023.00
10/03/19	IRS	Conduct legal research and analysis regarding 1st Circuit legal standards on motion to dismiss, Puerto Rico fraudulent transfer law, and legal ownership and control of funds. (3.3). Prepare response in opposition to Walmart's Motion to Dismiss (4.3)	7.60	350.00	2,660.00
10/03/19	EJ	Legal research (2.30) for and drafting of memorandum on appellate issues relating to prospective settlement agreement (2.0), confirmation and other matters (1.0). Review 1st circuit case law (2.0).	7.30	475.00	3,467.50
10/03/19	SS	Review and analyze database document from Kobre and Kim Batch SS1, Tranch 27 (81 documents)	2.10	195.00	409.50

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10/03/19	JZ	Receipt and review of Motion for Extension of Time filed by Cooperativa de Seguros de Vida (.1); receipt and review of Motion for Extension of Time filed by Cooperativa de Ahorro & Credito Hatillo (.1); receipt and review of Motion for Extension of Time filed by Cooperativa de Ahorro & Roosevelt Roads (.1); receipt and review of Motion for Extension of Time filed by Cooperativa de Ahorro & Credito San Rafael filed in ADV 19-00283 (.1); circulate motions (.1); update electronic case profile (.1).	0.60	195.00	117.00
10/03/19	JZ	Attention to sealed electronic summons issued in ADV No. 19-00283, 19-00281 and 19-00282; conference with S. Siff regarding access to sealed service.	0.30	195.00	58.50
10/04/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
10/04/19	JHG	Review ECF 8813 order denying motion to intervene.	0.80	765.00	612.00
10/04/19	JHG	Review issues with respect to draft motion and email from Ali Hassan at Jones Day.	1.10	765.00	841.50
10/04/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1135 - 1158).	1.30	565.00	734.50
10/04/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1159 - 1225).	1.90	565.00	1,073.50
10/04/19	JMS	Work on Walmart response to Motion to Dismiss.	2.80	500.00	1,400.00
10/04/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 7 (37 Documents).	2.10	465.00	976.50
10/04/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 8 (37 Documents).	2.80	465.00	1,302.00
10/04/19	IRS	Analyze statute of limitations period for section 544 IRS-based transfers and review legal research regarding same.	1.20	350.00	420.00
10/04/19	IRS	Revise draft Response in Opposition to Walmart's Motion to Dismiss.	0.50	350.00	175.00
10/04/19	IRS	Review docket entry updates from S.Siff.	0.30	350.00	105.00
10/04/19	EJ	Continue legal research (2.0) and drafting memorandum (2.50) on stays pending appeals and related matters in the First Circuit (2.0).	6.60	475.00	3,135.00
10/04/19	SS	Review and Analyze documents from Kobre and Kim database, Batch SS!, Tranche 28 (141 documents)	1.90	195.00	370.50

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10/04/19	JNS	Attention to emails from Brown Rudnick attaching Amended Tolling Agreements to be executed by GJB on behalf of the Official Creditors Committee (.5); save record, update tracking file, update calendar with new deadlines, circulate executed copy agreements (.6).	1.10	75.00	82.50
10/04/19	JZ	Receipt and review of Order Denying Motions for Extension of Time filed in Adv. 19-00283 as moot due to the stay order; circulate same; update electronic case profile.	0.20	195.00	39.00
10/05/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1226 - 1289).	1.60	565.00	904.00
10/05/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 9 (41 Documents).	3.10	465.00	1,441.50
10/06/19	EJ	Continued legal research and drafting of memorandum on appellate issues related to settlements in the First Circuit.	3.20	475.00	1,520.00
10/07/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	1.10	765.00	841.50
10/07/19	JHG	Review and analyze ECF 1649, informative motion of Cortland Capital Market.	0.90	765.00	688.50
10/07/19	JHG	Review ECF 33 in adversary 19-00357, email thread.	0.40	765.00	306.00
10/07/19	JHG	Review and analysis of ECF 8818 order establishing initial procedures.	0.80	765.00	612.00
10/07/19	JHG	Extensive review of strategy memorandum by E. Jacobs regarding effect of appeals, stays and/or settlements in pending litigation.	3.20	765.00	2,448.00
10/07/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1290 - 1303).	1.10	565.00	621.50
10/07/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1304 - 1400).	1.40	565.00	791.00
10/07/19	MGG	E-mail to and from Johana Zamora re: Bond adversary cases and update of spreadsheet.	0.40	575.00	230.00
10/07/19	MGG	Review Doc No. 8818 Order Establishing Initial Procedures With Respect to (I) Objections of UCC and Official Committee of Retired Employess Committee Pursuant to Bankruptcy to Claims Asserted by Bond Holders, (II) Count One of Certain Complaints Alleging Ultra Vires and (III) Establishing Claim Objection Deadline (.30). Analyze impact on Adversaries: 19-00355; 19-00356; 19-00357; 19-00359 and 19-00361 (.20).	0.50	575.00	287.50
10/07/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 10 (57 Documents).	3.30	465.00	1,534.50
10/07/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 11 (13 Documents).	1.90	465.00	883.50

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10/07/19	EJ	Continued legal research for, and drafting of, memorandum on stays pending appeals, and related matters in the first circuit.	2.80	475.00	1,330.00
10/07/19	IRS	Review docket entry updates from S.Siff.	0.30	350.00	105.00
10/08/19	JHG	Review issues regarding Supreme Court/Aurelis and potential impact on GJB litigation.	0.80	765.00	612.00
10/08/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1401 - 1426).	0.90	565.00	508.50
10/08/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1427 - 1535).	2.60	565.00	1,469.00
10/08/19	MGG	Correspondence with Angelo Castaldi re: Clawback litigation re: ANB Bank and reference to Third Amended Complaint confirming dismissal of ANB Bank.	0.20	575.00	115.00
10/08/19	MAF	Walmart: review and markup response to motion to dismiss (2.3); review First Circuit case law regarding property of the estate issues in connection with the same (1.4).	3.70	550.00	2,035.00
10/08/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 13 (58 Documents).	2.70	465.00	1,255.50
10/08/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 12 (45 Documents).	2.90	465.00	1,348.50
10/08/19	AMC	Correspondence with M. Guitian re: clawback litigation.	0.20	375.00	75.00
10/08/19	AMC	Research concerning applicability of Sections 541 and 902 in PROMESA proceedings, and review of PROMESA statutory provisions concerning the same	1.60	375.00	600.00
10/08/19	AMC	Attend to e-mail communications with counsel for ANB Bank, which was previously a defendant in Adversary Cases 19-00356 and 19-00281	0.40	375.00	150.00
10/08/19	JPB	Analyze claims and revise outline regarding legal positions in support of response to Monoline complaint (19-00422).	2.30	375.00	862.50
10/08/19	IRS	Conduct legal research and analysis regarding scope of "property of debtor" under PROMESA relating to Walmart claim.	0.60	350.00	210.00
10/08/19	IRS	Review and analyze memorandum from Brown Rudnick regarding Walmart claims.	0.80	350.00	280.00
10/08/19	IRS	Prepare internal correspondence regarding ownership and control of property under Puerto Rico law relating to Walmart claim.	0.60	350.00	210.00
10/08/19	IRS	Review internal memorandum drafted by E. Jacobs regarding appellate issues relating to potential settlements and confirmation orders.	0.40	350.00	140.00

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10/08/19	IRS	Review redline edits and comments from M. Friedman regarding Walmart Response to Motion to Dismiss.	0.80	350.00	280.00
10/08/19	IRS	Revise draft response in opposition to Walmart motion to dismiss.	1.70	350.00	595.00
10/08/19	SS	Review and Analyze Kobre and Kim documents, Batch SS1, Tranche 29 (18 documents)	0.80	195.00	156.00
10/08/19	JZ	Receipt and review of Sharefile link from BrownRudnick containing BR's analysis of the Wal-mart adversary proceeding and exhibits (.3); download and index same (.2); update electronic case profile (.1).	0.60	195.00	117.00
10/09/19	JHG	Review status of analysis of preferences in PREPA.	0.70	765.00	535.50
10/09/19	JHG	Review S. Siff daily summary to identify and analyze strategic litigation issues.	0.60	765.00	459.00
10/09/19	JHG	Review ECF 8833 regarding automatic stay.	0.20	765.00	153.00
10/09/19	JHG	Review ECF 8834 involving same.	0.10	765.00	76.50
10/09/19	JHG	Review GJB filed urgent agreed motion setting Doc 22 in 19-00388 LTS.	0.70	765.00	535.50
10/09/19	ALG	Review financial related documents provided by Kobre and Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1536 - 1592).	1.60	565.00	904.00
10/09/19	ALG	Review financial related documents provided by Kobre and Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1593 - 1697).	2.80	565.00	1,582.00
10/09/19	JMS	Continued work on Walmart Motion to Dismiss (1.3); continued work and analysis concerning proposed settlement (1.2)	2.50	500.00	1,250.00
10/09/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 15 (45 Documents).	2.90	465.00	1,348.50
10/09/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 14 (52 Documents).	3.20	465.00	1,488.00
10/09/19	JPB	Analyze potential legal claims under Puerto Rico law related to swap transactions and revise outline for Amended Complaint (19-00280).	2.20	375.00	825.00
10/09/19	JPB	Analyze potential legal claims under federal law related to swap transactions and revise outline for Amended Complaint (19-00280).	1.10	375.00	412.50
10/09/19	JPB	Outline and analyze use of proceeds for general obligation bond issuances in anticipation of revising Amended Complaint (19-00280).	2.20	375.00	825.00

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10/09/19	JPB	Outline and analyze use of proceeds for general obligation bond issuances in anticipation of revising Amended Complaint (19-00280).	3.60	375.00	1,350.00
10/09/19	JPB	Outline and analyze use of proceeds for building authority bond issuances in anticipation of revising Amended Complaint (19-00280).	2.10	375.00	787.50
10/09/19	IRS	Strategize regarding ownership of funds under federal bankruptcy and Puerto Rico law relating to Walmart. (.7)	1.80	350.00	630.00
		Revise response in opposition to Walmart motion to dismiss. (.6)			
		Prepare correspondence to SCC Counsel regarding legal memorandum and providing draft response to Walmart's motion to dismiss for final comments. (.2)			
		Review redline edits and comments from SCC Counsel regarding Response to Walmart's motion to dismiss. (.3)			
10/10/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues..	0.80	765.00	612.00
10/10/19	JHG	Review ECF 19-00355 regarding adversary initial procedures.	0.90	765.00	688.50
10/10/19	JHG	Review adversary proceedings 00355, 00356, 00357, 00359 and 00361 to analyze issues.	3.60	765.00	2,754.00
10/10/19	JHG	Review ECF 8821 and PREPA 1648 and analyze.	2.20	765.00	1,683.00
10/10/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1699 - 1817).	3.30	565.00	1,864.50
10/10/19	MAF	Review emails from I Sadovnik and J Suarez with proposed edit to motion to dismiss response, consider edits and respond (0.3)	0.30	550.00	165.00
10/10/19	JA	Review correspondence regarding change to identifier of Committee concerning PBA.	0.10	575.00	57.50
10/10/19	JMS	Work on response to Wal-Mart Response to Motion to Dismiss (1.4); work on claims relating to CITI and potential settlement (1.8); attention to tolling agreements for underwriter parties (1.4)	4.60	500.00	2,300.00
10/10/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 3 (39 documents).	4.30	375.00	1,612.50
10/10/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 4 (51 documents).	4.10	375.00	1,537.50
10/10/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 17 (68 Documents).	2.80	465.00	1,302.00
10/10/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 16 (58 Documents).	3.10	465.00	1,441.50

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10/10/19	IRS	Review comments from J.Suarez regarding draft response in opposition to Walmart's motion to dismiss and revise draft.	0.80	350.00	280.00
10/10/19	IRS	Review docket update from S. Siff.	0.30	350.00	105.00
10/10/19	JNS	Strategize with J. Zamora regarding tolling deadlines.	0.20	75.00	15.00
10/10/19	SS	Review and Analyze Kobre and Kim database documents Batch SS1, Tranche 30 (77 documents)	2.20	195.00	429.00
10/10/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
10/10/19	JNS	Attention to various tolling agreements (names withheld as tolled parties).	0.90	75.00	67.50
10/11/19	JHG	Review S. Siff daily summary to identify and analyze strategic litigation issues.	0.30	765.00	229.50
10/11/19	ALG	Review financial related documents provided by Kobre and Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1817 - 1850).	1.40	565.00	791.00
10/11/19	ALG	Review financial related documents provided by Kobre and Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1851 - 1910).	1.30	565.00	734.50
10/11/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1911 - 1985).	2.70	565.00	1,525.50
10/11/19	JA	Review pre-confirmation scheduling order chart and strategize regarding UCC comments.	0.40	575.00	230.00
10/11/19	JMS	Review and finalize Wal-Mart Response to Motion to Dismiss (2.3); work on claims relating to CITI and potential settlement (2.5)	5.30	500.00	2,650.00
10/11/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 4 (32 documents).	2.10	375.00	787.50
10/11/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 20 (28 Documents).	1.90	465.00	883.50
10/11/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 18 (45 Documents).	2.70	465.00	1,255.50
10/11/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 19 (4 Documents).	1.60	465.00	744.00
10/11/19	JPB	Analysis and legal research related to 13 LPRA Sec. 82 in anticipation of revising the Amended Complaint (Adv 19-00280).	3.60	375.00	1,350.00
10/11/19	IRS	Finalize response in opposition to Walmart's motion to dismiss and prepare for filing.	1.20	350.00	420.00
10/11/19	IRS	Conduct legal research and analysis regarding Puerto Rico Act 39 in relation to bond underwriter fiduciary duties.	0.80	350.00	280.00

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10/11/19	SS	Review and Analyzed Kobre and Kim documents from database. Batch SS1, Tranche 31, (102 documents)	2.20	195.00	429.00
10/11/19	JZ	Revise, finalize and file Response to Motion to Dismiss in the Walmart adversary; update electronic case profile.	0.60	195.00	117.00
10/14/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
10/14/19	JHG	Review ECF 8842 regarding compliance with 2004 request.	0.30	765.00	229.50
10/14/19	JHG	Review ECF 8843, contested motion for extension of deadlines.	0.40	765.00	306.00
10/14/19	JHG	Review email from S. Siff regarding briefing schedule.	0.30	765.00	229.50
10/14/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 1985 - 2030).	1.50	565.00	847.50
10/14/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 2031 - 2143).	3.20	565.00	1,808.00
10/14/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 2144 - 2300).	3.10	565.00	1,751.50
10/14/19	MGG	Review Doc No. 12 and 13 Adv 19-00267 re: Wal-Mart Puerto Rico Inc., and UCC's Amended Response In Opposition to Wal-Mart's Motion to Dismiss and monitor overall proceedings confer with J. Arrastia [Doc No. 8].	0.30	575.00	172.50
10/14/19	JA	Revise Response to Walmart Motion to Dismiss and Reflect Amounts; signatories (.1); review Swap Agreement research issues (.2).	0.30	575.00	172.50
10/14/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 5 (61 documents).	3.10	375.00	1,162.50
10/14/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 6 (106 documents).	3.80	375.00	1,425.00
10/14/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 7 (44 documents).	3.40	375.00	1,275.00
10/14/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 21 (40 Documents).	2.30	465.00	1,069.50
10/14/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 22 (55 Documents).	2.90	465.00	1,348.50
10/14/19	IRS	Prepare and file amended response in opposition to Walmart's motion to dismiss.	0.80	350.00	280.00
10/14/19	IRS	Prepare correspondence to J. Cartaya concerning Walmart litigation.	0.40	350.00	140.00

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10/14/19	IRS	Strategize regarding pending matters and legal options relating to the monoline complaint.	0.40	350.00	140.00
10/14/19	IRS	Confer with UCC local counsel J. Cartaya regarding status of Walmart claims and compile case materials for his review.	0.80	350.00	280.00
10/14/19	IRS	Prepare correspondence to local counsel regarding legislative history of Puerto Rico Act 39.	0.40	350.00	140.00
10/14/19	IRS	Conduct legal research and analysis regarding Puerto Rico Act 39 in relation to bond underwriter fiduciary duties.	1.40	350.00	490.00
10/14/19	SS	Review and analyze documents from Kobre and Kim database, Batch SS!, Tranch 32 (26 documents).	1.30	195.00	253.50
10/14/19	TG	Search Relativity database re: Preliminary Official Statement (Puerto Rico Electric Power Authority); forward results to A. Gonzalez for review.	0.40	120.00	48.00
10/14/19	JZ	Revise Motion to Dismiss in the Walmart adversary (.1); finalize and file revised motion (.2); update electronic case profile (.1).	0.40	195.00	78.00
10/14/19	JNS	Receive and print amended copy of Tolling Agreement for tolled defendants, review with attorney Jesus Suarez, scan, save in files, circulate to corresponding parties and calendar new expiration date.	0.30	75.00	22.50
10/14/19	JNS	Receive and print amended copy of Tolling Agreement for tolled defendants, review with attorney Jesus Suarez, scan, save in files, circulate to corresponding parties and calendar new expiration date.	0.30	75.00	22.50
10/15/19	JHG	Review S. Siff summary to identify and analyze strategic litigation issues.	0.30	765.00	229.50
10/15/19	JHG	Review email from Jocelyn Kuo and attached urgent motion ECF 8854.	0.70	765.00	535.50
10/15/19	JHG	Review October 15, 2019 S. Siff daily summary of filings.	0.60	765.00	459.00
10/15/19	JHG	Review ECF 8854, urgent motion to exceed page limitation.	0.50	765.00	382.50
10/15/19	JHG	Review ECF 1656, same relief as ECF 8854; review email from J. Arrastia and attached materials provided regarding Citi proposed settlement.	3.40	765.00	2,601.00
10/15/19	JHG	Review and analyze issues regarding Citi involving marketing payments to authenticate debt.	2.70	765.00	2,065.50
10/15/19	JA	Prepare email memorandum regarding analysis relating to proposed Citi settlement and strategy to confer with J. Genovese.	1.20	575.00	690.00
10/15/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 2301 - 2325).	1.40	565.00	791.00

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10/15/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 2326 - 2413).	3.30	565.00	1,864.50
10/15/19	GMG	Attention to issues re claims asserted in proposed fuel oil complaint.	0.60	630.00	378.00
10/15/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 8 (33 documents).	3.80	375.00	1,425.00
10/15/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 9 (51 documents).	3.60	375.00	1,350.00
10/15/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 24 (50 Documents).	2.40	465.00	1,116.00
10/15/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 23 (45 Documents).	2.40	465.00	1,116.00
10/15/19	IRS	Discuss ongoing document review and important findings relating to the underwriter complaint.	0.30	350.00	105.00
10/15/19	IRS	Review docket updates from S. Siff.	0.20	350.00	70.00
10/15/19	SS	Review and analyze documents from Kobre and Kim database Batch SS!, Tranche 33 (32 documents)	1.10	195.00	214.50
10/16/19	JHG	Review S. Siff email summary of October 15, 2019 late filings to identify and analyze strategic litigation issues.	1.20	765.00	918.00
10/16/19	JHG	Review ECF 8856 urgent motion regarding Magistrate order on Jose Ortiz.	0.40	765.00	306.00
10/16/19	JHG	Review ECF 8857, Fuel Line Lenders urgent motion.	0.40	765.00	306.00
10/16/19	JHG	Review and analysis of PREPA ECF 1657 UCC reply to protective order relating to Jose Ortiz.	0.60	765.00	459.00
10/16/19	JHG	Review notice Doc 24 in Adv 19-00388 regarding Brown and Rudnick request for notice (.4); review email from H. Harmon and analysis of preference payments (2.4).	2.80	765.00	2,142.00
10/16/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1 - 41) (1.3)	2.30	565.00	1,299.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 42 - 82) (1.0)			
10/16/19	MGG	Receipt and review email from Tristan Axelrod re: Dismissal of a number of related parties in the Clawback action.	0.30	575.00	172.50
10/16/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 10 (28 documents).	3.10	375.00	1,162.50
10/16/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 11 (40 documents).	3.30	375.00	1,237.50

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10/16/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 25 (24 Documents).	1.70	465.00	790.50
10/16/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 26 (3 Documents).	1.90	465.00	883.50
10/16/19	IRS	Strategize regarding options available to UCC relating to the Monoline Complaint.	0.60	350.00	210.00
10/16/19	IRS	Conduct legal research and analysis regarding standing to pursue stay of third-party derivative claims under federal bankruptcy law.	4.80	350.00	1,680.00
10/17/19	JHG	Review email from Alex Bongartz regarding briefing and argument on Supreme Court and attached regarding Ortiz deposition..	0.80	765.00	612.00
10/17/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
10/17/19	JHG	Review ECF 8872 regarding deadlines on discovery.	0.60	765.00	459.00
10/17/19	JHG	Review ECF 8873 regarding 2004 examination.	0.30	765.00	229.50
10/17/19	JHG	Review Doc 8873 in 17-03283 regarding 2004 compliance.	0.30	765.00	229.50
10/17/19	JHG	Review ECF 1668 in 17-04780 regarding motion to exceed page limitation.	0.30	765.00	229.50
10/17/19	JHG	Review S. Siff October 17, 2019 daily summary to identify and analyze strategic litigation issues.	0.30	765.00	229.50
10/17/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 83 - 117) (1.5)	3.20	565.00	1,808.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 118 - 165) (1.5)			
10/17/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 12 (46 documents).	3.80	375.00	1,425.00
10/17/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 13 (55 documents).	3.60	375.00	1,350.00
10/17/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 14 (62 documents).	3.30	375.00	1,237.50
10/17/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 28 (30 Documents).	2.30	465.00	1,069.50
10/17/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 27 (43 Documents).	2.60	465.00	1,209.00
10/17/19	JNS	Review email regarding Amendment to Tolling Agreement for tolled defendant. Circulate executed copy. Update calendar and files with new expiration date.	0.30	75.00	22.50

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10/18/19	JHG	Review daily summary prepared by S. Siff.	0.50	765.00	382.50
10/18/19	JHG	Review ECF 8890 to determine relief from stay impact in claims in bond litigation.	0.90	765.00	688.50
10/18/19	JHG	Continued review of issues in Walmart litigation and Walmart's claim of no property of estate involved.	2.30	765.00	1,759.50
10/18/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 165 - 176) (1.1)	4.20	565.00	2,373.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 177 - 232) (1.4)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 233 - 329) (1.7)			
10/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 15 (36 documents).	3.20	375.00	1,200.00
10/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 16 (43 documents).	3.60	375.00	1,350.00
10/18/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 29 (41 Documents).	3.20	465.00	1,488.00
10/18/19	SS	Review and Analyze documents from Kobre and Kim database, Batch SS!, atrnche 34 (107 documents)	2.20	195.00	429.00
10/21/19	JHG	Review email from Luc Despins.	0.20	765.00	153.00
10/21/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.20	765.00	153.00
10/21/19	JHG	Review ECF 8907, stipulated protective order.	0.90	765.00	688.50
10/21/19	JHG	Review ECF 1675, stipulated protective order.	0.60	765.00	459.00
10/21/19	JMS	Strategize with Mike Friedman and I. Sadovnic regarding Reply (.4)	0.40	500.00	200.00
10/21/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 330 - 370) (2.3)	5.60	565.00	3,164.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 371- 401) (1.7)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 402 - 440) (1.6)			

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10/21/19	MAF	Review motion for leave to file reply in support of motion to dismiss (0.5), review proposed reply and exhibits (0.8), strategize with J. Suarez and I. Sadovnic regarding the same, implications, next steps (0.4).	1.70	550.00	935.00
10/21/19	JA	Receive and review motion requesting permission to file reply and proposed reply (.5); strategize regarding reply and responses (.4); attention to Tolling Agreement extensions (.3).	1.20	575.00	690.00
10/21/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 17 (76 documents).	4.10	375.00	1,537.50
10/21/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 18A (38 documents).	3.40	375.00	1,275.00
10/21/19	AMC	Review of documents produced by Santander concerning closed-end fund trading materials and GO bond issuances	1.30	375.00	487.50
10/21/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 30 (56 Documents).	2.80	465.00	1,302.00
10/21/19	IRS	Receipt and review Walmart's reply and exhibits attached thereto in support of its Motion to Dismiss. (1.3) Confer with M. Friedman regarding reply and strategy (.4) Strategize regarding potential sur-reply to Walmart's reply in support of its Motion to Dismiss. (.3)	2.00	350.00	700.00
10/21/19	SS	Review and Analyze database of documents produced by Kobre and Kim, Batch SS! Tranche 35 (53 documents)	1.30	195.00	253.50
10/21/19	JNS	Emails to John Arrastia, Jesus Suarez and J. Zamora regarding pending tolling agreements to be amended.	0.40	75.00	30.00
10/21/19	JZ	Receipt and review of Walmart's Reply to Response to Motion to Dismiss filed in the Walmart adversary (.3); circulate same; attention to e-mails between J. Arrastia and I. Sadovnic regarding filing (.2); update electronic case profile (.1)	0.60	195.00	117.00
10/22/19	JHG	Review transfer analysis regarding Citi provided by H. Harmon.	2.60	765.00	1,989.00
10/22/19	JHG	Review summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
10/22/19	JHG	Review and analysis of Doc 14 in 19-00267 motion to file reply.	0.40	765.00	306.00
10/22/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 440 - 472) (1.6) Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 473 - 603) (4.2)	6.80	565.00	3,842.00

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10/22/19	JA	Continued review and attention to status of tolling parties (.4); analyze discovery requirements for Walmart Adv. (.4)	0.80	575.00	460.00
10/22/19	IRS	Review the most recent case management order regarding Walmart Adv.	0.30	350.00	105.00
10/22/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 18B (31 documents).	3.30	375.00	1,237.50
10/22/19	AMC	Review and substantial analysis of allegations, claims, and exhibits set forth in monoline insurers' adversary complaint involving mutual defendant-financial institutions	4.10	375.00	1,537.50
10/22/19	IRS	Review extensive docket entry updates from S. Siff.	0.60	350.00	210.00
10/22/19	IRS	Strategize regarding Monoline complaint issues and discuss legal analysis relating to motions to intervene in an adversary proceeding.	0.40	350.00	140.00
10/22/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS!, Tranche 36 (68 documents)	1.40	195.00	273.00
10/23/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
10/23/19	JHG	Review Doc 267 in 19-00267 LTS.	0.20	765.00	153.00
10/23/19	JHG	Review email memorandum from J. Arrastia regarding status of all pending matters handled by GJB and analysis of status and issues in each case.	4.60	765.00	3,519.00
10/23/19	JHG	Review and identify issues in Walmart amended response to dismiss.	0.90	765.00	688.50
10/23/19	JHG	Review and analyze issues in Doc 8 in adversary 19-00267, Walmart motion to dismiss and compare to UCC response.	1.60	765.00	1,224.00
10/23/19	JA	Prepare email memorandum regarding all pending matters, status and general strategy.	1.80	575.00	1,035.00
10/23/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 604 - 694)	2.70	565.00	1,525.50
10/23/19	JA	Review vendor tolling agreements from SCC.	0.20	575.00	115.00
10/23/19	JMS	Review issues with proposed amendments to underwriter litigation (2.4); review status of tolling agreements with parties tolled in underwriter complaint (1.8)	3.20	500.00	1,600.00
10/23/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 31 (50 Documents).	2.60	465.00	1,209.00
10/23/19	AMC	Conduct substantial research concerning injunctive relief and extension of automatic stay under s. 362 and s. 105 of the Bankruptcy Code	5.10	375.00	1,912.50

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10/23/19	AMC	Analyze overlay between issues / claims asserted by monoline insurers, and claims asserted by Commonwealth in Adv. Case No. 19-280	0.80	375.00	300.00
10/23/19	IRS	Review order granting Walmart's motion to file reply to response in opposition to motion to dismiss.	0.20	350.00	70.00
10/23/19	IRS	Call with local counsel regarding legislative history of Act 39 and pending legal research.	0.30	350.00	105.00
10/23/19	IRS	Review docket entry updates from S. Siff.	0.30	350.00	105.00
10/23/19	SS	Review and Analyze database of documents from Kobre and Kim, Batch SS1, Tranche 37 (57 documents)	1.80	195.00	351.00
10/24/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 695 - 713) (1.4)	4.60	565.00	2,599.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 714 - 772) (1.8)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 773 - 807) (1.4)			
10/24/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 32 (33 Documents).	2.20	465.00	1,023.00
10/24/19	AMC	Conduct substantial research concerning derivative versus particularized claims (1.9), extension of the automatic stay to non-debtors (1.8), and injunctive relief theories broadly (1.4)	5.10	375.00	1,912.50
10/24/19	IRS	Legal analysis regarding monoline complaint claims and potential legal options relating to same.	0.40	350.00	140.00
10/24/19	IRS	Evaluate Wal-Mart's reply in support of motion to dismiss (.8)	4.00	350.00	1,400.00
		Prepare motion for leave to file sur-reply (.7)			
		Prepare sur-reply (2.3)			
10/24/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 38 (70 documents)	1.75	195.00	341.25
10/25/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 808 - 867) (2.2)	6.10	565.00	3,446.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 868 - 901) (1.8)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 902 - 990) (2.1)			

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10/25/19	MAF	Review updated draft of response to motion to intervene (3.6); review next draft, further revisions, conference with J Arrastia regarding the same; review of Special Claims Committee response to motion to intervene (0.8); final review and send final edits and comments to response, and conference with A Castaldi concerning the same (0.7)	5.10	550.00	2,805.00
10/25/19	JMS	Attention to resolution of vendor claims (1.4); attention to continued issues regarding proposed Citi Settlement (.9)	2.30	500.00	1,150.00
10/25/19	JA	Receive and review Walmart Rule 11 correspondence from opposing counsel (.7); and strategize regarding same (.5).	1.20	575.00	690.00
10/25/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 33 (44 Documents).	2.90	465.00	1,348.50
10/25/19	IRS	Review and analyze Case Management Orders applicable to adversary proceedings.	0.70	350.00	245.00
10/25/19	IRS	Prepare correspondence regarding UCC's obligations under the Case Management Orders applicable to adversary proceedings.	0.30	350.00	105.00
10/25/19	IRS	Revise sur-reply to Walmart's reply in support of motion to dismiss.	1.50	350.00	525.00
10/25/19	JZ	Internal conference regarding next week's omnibus hearing; draft information motion of J. Suarez's attendance at hearing; e-mail same to J. Suarez for review.	0.50	195.00	97.50
10/26/19	JA	Review mediation team leader motion	0.10	575.00	57.50
10/28/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
10/28/19	JHG	Review and analyze ECF 8999, regarding urgent motion to determine impact on further extension of litigation stay.	1.20	765.00	918.00
10/28/19	JHG	Review ECF 9001 and analysis regarding stay and mandatory mediation.	0.80	765.00	612.00
10/28/19	JHG	Review ECF 9004 in PREPA.	0.40	765.00	306.00
10/28/19	JHG	Review and analysis of ECF 9005 to determine how extended deadlines affect 9019 litigation.	1.10	765.00	841.50
10/28/19	JHG	Review ECF 9008.	0.30	765.00	229.50
10/28/19	JHG	Review ECF 9010, PREPA 1684, sixth revised order.	0.40	765.00	306.00
10/28/19	JHG	Review ECF 9014, urgent motion and analyze impact on 9019 litigation.	0.70	765.00	535.50
10/28/19	JHG	Review and analysis of answer and counterclaim Doc 22 in 19-00359, to determine impact on bond litigation.	1.30	765.00	994.50

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10/28/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 991 - 1034) (1.7)	3.00	565.00	1,695.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1035 - 1053) (1.3)			
10/28/19	JA	Review and approve Supplemental Appendix for Avoidance Action (.1); review Stay Order (.1)	0.20	575.00	115.00
10/28/19	MGG	Review Doc No. 8999 Response of AmeriNational Community Services in connection with Urgent Joint Motion of Oversight Board and AAFAF For Order Extending (A) Stay Period, (B) Mandatory Mediation, and (C) Certain Deadlines Related Thereto [ECF 8972] and impact on issues regarding the scheduling of procedural matters and the resolution of substantive issues (.20) and review of Doc No. 9001 also in connection with the Urgent Motion [Doc No. 8972], filed by Assured, Ambac, National, FGIC and the Invesco Funds opposing the motion (.20); and Doc No. 9005 Sixth Revised Order extending and establishing Certain Deadlines (.20).	0.60	575.00	345.00
10/28/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 34 (38 Documents).	2.30	465.00	1,069.50
10/28/19	AMC	Conducted detailed research concerning Section 105(a), Section 362, and injunctive remedies under the same	3.60	375.00	1,350.00
10/28/19	JZ	Receipt and review of the Order Granting Urgent Joint Motion of Oversight Board and AAFAF for Order Extending (a) Stay Period, (b) Mandatory Mediation, and (c) Certain Deadlines Related Thereto; calendar deadlines; circulate same; update electronic case profile.	0.50	195.00	97.50
10/29/19	JHG	Review memorandum prepared by E. Jacobs regarding questions regarding finalizing of settlement orders and releases.	1.90	765.00	1,453.50
10/29/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
10/29/19	JHG	Review agenda for October 30, 2019 hearings.	1.10	765.00	841.50
10/29/19	JHG	Review Doc 9030 third informative schedule regarding motion to compel.	0.40	765.00	306.00
10/29/19	JHG	Review Doc 1686, related to third informative motion regarding depositions of Morales and Torres.	0.30	765.00	229.50
10/29/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.50	765.00	382.50
10/29/19	JHG	Review and analyze ECF 9038 response to urgent joint motion.	0.20	765.00	153.00
10/29/19	JHG	Review and analysis of issues regarding Amici Legal Brief and order denying in connection with RSA settlement and issues raised in motion.	0.60	765.00	459.00

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10/29/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1054 - 1075) (1.3)	2.30	565.00	1,299.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1076 - 1096) (1.0)			
10/29/19	JMS	Continued attention to Walmart claims and issues raised by Reply.	1.40	500.00	700.00
10/29/19	JA	Review SCC DGC analysis regarding Avoidance Claims relating to Mangual Cleaning.	0.40	575.00	230.00
10/29/19	MGG	Review Doc No. 9042 - Informative Motion Of The FOMB and the UCC re: Order Granting Omnibus Motion by the FOMB by and through its SCC and the UCC to (I) Establish Litigation Case Management Procedures and (II) Establish Procedures for Approval of Settlements and the filing with the Court a list of all Avoidance Actions. (.30). Review Doc Nos. 9039 and 9040 re: Ambac Assurance's Discovery issues and monitor status of proceedings (.10).	0.40	575.00	230.00
10/29/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 35 (4 Documents).	1.90	465.00	883.50
10/29/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 36 (22 Documents).	2.80	465.00	1,302.00
10/29/19	IRS	Review docket entry update from S. Siff.	0.40	350.00	140.00
10/29/19	IRS	Strategize regarding status of Wal-Mart motion to dismiss sur-reply.	0.40	350.00	140.00
10/29/19	IRS	Prepare correspondence to local counsel following up on pending research on legislative history of Act 39.	0.20	350.00	70.00
10/29/19	JZ	Commence retrieving case law from the Walmart Motion to Dismiss.	0.50	195.00	97.50
10/30/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
10/30/19	JHG	Review and analyze ECF 9044 regarding plan adjustment issues.	0.40	765.00	306.00
10/30/19	JHG	Review email and supporting case law provided by E. Jacobs on various issues pertaining to litigation and plan confirmation.	3.60	765.00	2,754.00
10/30/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1097 - 1133)	2.00	565.00	1,130.00
10/30/19	JA	Telephonically attend Omnibus	1.60	575.00	920.00
10/30/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 19 (39 documents).	2.90	375.00	1,087.50

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10/30/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 37 (25 Documents).	1.80	465.00	837.00
10/30/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 38 (28 Documents).	2.70	465.00	1,255.50
10/30/19	IRS	Review and prepare extensive correspondence regarding preparation of answers to ERS counterclaims.	0.60	350.00	210.00
10/30/19	IRS	Review and analyze correspondence from local counsel and prepare internal correspondence regarding legislative history of Act 39 in relation to underwriter fiduciary duties.	0.50	350.00	175.00
10/30/19	IRS	Prepare litigation update regarding all GJB involved adversary proceedings, specifically determine all pending answers and upcoming deadlines.	0.60	350.00	210.00
10/30/19	IRS	Review Rule 11 correspondence from Walmart's counsel. (.4)	1.80	350.00	630.00
		Prepare legal analysis of Walmart claims for internal review. (.7)			
		Strategize regarding response to Rule 11 correspondence and preparation of internal client communications. (.7)			
10/30/19	IRS	Strategize regarding answers to ERS adversary proceeding counterclaims.	0.60	350.00	210.00
10/30/19	IRS	Review ERS adversary pleadings (19-357, 19-361, 19-367) (1.50). Prepare draft answers to Defendants' counterclaims (2.50).	4.20	350.00	1,470.00
10/30/19	IRS	Prepare correspondence to T.Axelrod regarding UCC's answers to ERS Adv. Counterclaims.	0.20	350.00	70.00
10/30/19	JPB	Analyze Amended Complaint to provide high level bullet points relating to new factual allegations and most impactful new claims in anticipation of call with co-counsel.	1.10	375.00	412.50
10/30/19	AMC	Telephone communication with counsel for ANB Bank	0.10	375.00	37.50
10/30/19	SS	Review and Analyze documents on database produced by Kobre and Kim, Batch SS1, Tranch 39 (106 documents),	2.60	195.00	507.00
10/31/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
10/31/19	JHG	Review and analysis of ECF 9062, preliminary statement and reservation of rights regarding RSA.	0.60	765.00	459.00
10/31/19	JHG	Review and analysis of ECF 9065, limited objection by fee examiner regarding RSA.	0.50	765.00	382.50
10/31/19	JHG	Review and analysis of ECF 9068, objection to PREPA bondholder settlement; review and analysis of ECF 1698, limited objection.	0.50	765.00	382.50
10/31/19	JHG	Review and analysis of PREPA ECF 1696 preliminary statement and reservation of rights.	0.70	765.00	535.50

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10/31/19	JHG	Review and analysis of ECF 1700, objection to PREPA bondholder settlement.	1.20	765.00	918.00
10/31/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1134 - 1151) (1.3)	5.30	565.00	2,994.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1152 - 1183) (1.6)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1184 - 1274) (2.4)			
10/31/19	IRS	Review correspondence from co-counsel regarding answers to ERS adversary counterclaims. (.5)	4.30	350.00	1,505.00
		Prepare correspondence to counsel from Proskauer regarding drafts to 19-367 ERS adversary counterclaims. (.2)			
		Strategize regarding preparations and completion of answers to ERS counterclaims and coordinate labor between co-counsel's offices. (.6)			
		Revise draft answers to ERS Adv. 19-356 and 19-359 (3)			
10/31/19	IRS	Confer regarding legal research and analysis of Legislative history of Puerto Rico's Act 39 and applicability to current underwriter claims.	0.30	350.00	105.00
10/31/19	IRS	Review docket entry updates from S.Siff.	0.40	350.00	140.00
10/31/19	JPB	Review and analyze underwriters' presentations and advice to GDB prior to 2013 bond issuances in anticipation of amending factual allegations of the Complaint (19-00280).	4.30	375.00	1,612.50
10/31/19	JPB	Review and analyze underwriters' presentations and advice to GDB prior to 2014 bond issuance in anticipation of amending factual allegations of the Complaint (19-00280).	3.60	375.00	1,350.00
10/31/19	SS	Review and Analyze database documents from Kobre and Kim, Batch SS!, Tranche 40 (105 documents)	2.30	195.00	448.50
Subtotal: B191 / General Litigation			591.15		\$283,517.25
B320 / Plan and Disclosure Statement					
10/01/19	MGG	Continue review of Disclosure Statement and Plan of Adjustment and outline key provisions.	2.30	575.00	1,322.50
10/02/19	JA	Continued initial analysis of various Plans of Adjustment and Disclosure Statements.	1.80	575.00	1,035.00
10/02/19	MGG	Continue review of Plan and Disclosure Statement re: treatment and impact on pending litigation against Bond Holders, and Third Party Defendants.	2.20	575.00	1,265.00

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10/07/19	MGG	Finalize notes and outline of summary of Commonwealth Plan of Adjustment for John Genovese, John Arrastia, and Jesus Suarez.	1.70	575.00	977.50
10/07/19	JA	Review summary of Plan of Adjustment by M. Guitian.	0.40	575.00	230.00
10/28/19	MGG	Review Doc Nos. 9022 and 9023 submitted by FOMB and AMBAC in coonection with Plan of Adjustment and Disclosure Statement.	0.50	575.00	287.50
Subtotal: B320 / Plan and Disclosure Statement			8.90		\$5,117.50
Total			782.85		\$337,816.25

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	85.70	765.00	65,560.50
JMS	Jesus M Suarez	Partner	31.20	500.00	15,600.00
MAF	Michael A Friedman	Partner	12.60	550.00	6,930.00
ALG	Alfredo L Gonzalez	Partner	98.20	565.00	55,483.00
MGG	Mariaelena Gayo-Guitian	Partner	23.50	575.00	13,512.50
JA	John Arrastia	Partner	28.30	575.00	16,272.50
GMG	Greg M Garno	Partner	0.60	630.00	378.00
IRS	Irina R Sadovnic	Associate	61.60	350.00	21,560.00
JPB	JP Bado	Associate	110.80	375.00	41,550.00
AMC	Angelo M Castaldi	Associate	25.70	375.00	9,637.50
JAF	Juan A Fernandez-Barquin	Associate	96.90	465.00	45,058.50
EJ	Eric Jacobs	Associate	22.60	475.00	10,735.00
JNS	Jessey N Sardina	Paralegal	3.90	75.00	292.50
TG	Tricia Garcia-Montes	Paralegal	0.70	120.00	84.00
CE	Carolyn Esser	Paralegal	1.00	150.00	150.00
CBH	Colleen B Hopkins	Paralegal	9.50	195.00	1,852.50
SS	Steve Siff	Paralegal	156.75	195.00	30,566.25
JZ	Johana Zamora	Paralegal	13.30	195.00	2,593.50
Total			782.85		\$337,816.25

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	302.75
	Pacer - Online Research	664.00
10/01/2019	Data management and hosting (12272-001) Trustpoint.One 19-06307	16,104.73
10/31/2019	Data management and hosting (12272-001) Trustpoint.One 19-07106	7,060.18
10/31/2019	Data management and hosting - REFUND of July & August overpayment TrustPoint International LLC	-19,978.49

Total Costs incurrent and advanced **\$4,153.17**

Current Fees and Costs **\$341,969.42**

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019
Please Refer to
Invoice Number: 96486

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Oct 31, 2019

249,344.00

Costs incurred and advanced

3,515.86

Current Fees and Costs Due

252,859.86

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019

Please Refer to

Invoice Number: 96486

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Oct 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
10/14/19	JZ	Conference with A. Castaldi regarding revisions to the Fuel Oil transfer exhibits to list transfers based on the payment date versus the invoice date in chronological order; commence revising the Petrobas excel sheet.	2.00	195.00	390.00
10/25/19	JA	Call with Committee regarding case issues and strategy.	0.70	575.00	402.50
10/31/19	JNS	Assist J. Zamora finalizing transfers' spreadsheets. Review Draft Amended Complaint and title spreadsheets to match Exhibit description	1.30	75.00	97.50
Subtotal: B110 / Case Administration			4.00		\$890.00
B113 / Pleadings Review					
10/10/19	MGG	Review Doc No. PREPA 1648- Cortland Capital Market Services, as Administrative Agent and Solus' Reply in further support of their previously file Motion to Compel Discovery Responses in Connection with the PREPA RSA Settlement Motion; and PREPA 1649- related to 9019 Motion.	0.30	575.00	172.50
10/11/19	MGG	Review Memorandum Order Doc No. 8837 Regarding UCC's Urgent (I) Objections to Magistrate Judge's August 2, 2019 Order on Motion to Compel and (II) Alternative Motion to Strike and Exclude Out-of-Scope Declaration Testimony and Related Evidence and impact on 9019 RSA.	0.40	575.00	230.00
10/11/19	MGG	Review Doc No. 1652) re: UCC's Urgent (i) Objections to Magistrate Judge's August 2, 2019 Order on Motion to Compel [(the "Objections")] and (ii) Alternative Motion to Strike and to Exclude Out-of-Scope Declaration Testimony and Related Evidence (.20); and Doc No. 1576)Order overruling the Objection and denying the Motion to Strike (.10).	0.30	575.00	172.50

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10/18/19	MGG	Review Doc No. PREPA 1671 Urgent Motion for Correction to Fifth Revised Order Establishing Deadline in Connection with the PREPA RES 9019 Settlement Motion (PREPA 1235) (.20). Review Doc No. PREPA1672 Copy of Corrected Fifth Revised Order Modifying Certain Deadlines Applicable to the 9019 Joint Motion and related RSA Issues (.10).	0.30	575.00	172.50
10/28/19	MGG	Review Objection to PREPA settlement (140 pages) and impact on 9019 Motion .	0.50	575.00	287.50
Subtotal: B113 / Pleadings Review			1.80		\$1,035.00
B150 / Meetings of Creditors					
10/23/19	JA	Prepare status update to Committee regarding pending and upcoming litigation matters.	0.60	575.00	345.00
Subtotal: B150 / Meetings of Creditors			0.60		\$345.00
B160 / Fee/Employment Applications					
10/09/19	JA	Review and revise fee statement drafts.	0.70	575.00	402.50
10/10/19	MGG	Receipt and review email from Ken Forrest with copy of August invoice.	0.30	575.00	172.50
10/17/19	MGG	Review September invoices.	0.20	575.00	115.00
10/23/19	JA	Revise and prepare statements in compliance with fee examiner.	0.60	575.00	345.00
Subtotal: B160 / Fee/Employment Applications			1.80		\$1,035.00
B190 / Other Contested Matters					
10/01/19	JA	Review Objection to discovery ruling regarding PREPA 9019 and further strategize regarding 9019 issues relating to Chapados and Brownstein (1.4); confer with counsel for Citi regarding depositions (.2); receive additional Citi production and initial review for substantive content (1.1); additional preparation for depositions of RSA 9019 declarants (1.0).	3.70	575.00	2,127.50
10/02/19	JA	Review PREPA Revenue Allocation Overview (.6); prepare revised deposition notices and subpoenas for Chapados and Brownstein (.2); Examine exhibits for Chapados deposition (.7); Prepare additional revisions to deposition outline (1.8).	3.30	575.00	1,897.50
10/02/19	JZ	Attention to e-mails between J. Arrastia and M. Spillane regarding rescheduling of the Chapados and Brownstein deposition; draft revised deposition subpoenas for each deponent and revised Notices of Deposition; serve same; update electronic case profile.	0.70	195.00	136.50
10/02/19	JZ	Review of Order Setting Briefing Schedule on the UCC's objection to Magistrate's Order Granting Protective Order of Jose Ortiz; calendar deadlines; update electronic case profile.	0.30	195.00	58.50

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10/03/19	MGG	Review PREPA RSA issues and email to J. Suarez re: same.	0.60	575.00	345.00
10/03/19	JA	Review additional documentation regarding Chapado's deposition and consider use as exhibits (.6); continued review and analysis of materials for Chapados and Brownstein depositions (1.6); Prepare and revise outlines of Chapados and Brownstein (1.7)	3.90	575.00	2,242.50
10/03/19	JMS	Attention to email from M. Guitian re: RSA Issues (2.0). Review various pleadings filed in connection with PREPA RSA Issues (2.30).	4.30	500.00	2,150.00
10/04/19	JA	Prepare and revise deposition outline of Chapados (2.4); Review, select, and annotate additional proposed exhibits (1.2)	3.60	575.00	2,070.00
10/04/19	JMS	Attention to PREPA RSA Issues.	1.40	500.00	700.00
10/06/19	JA	Review and revise deposition notes and outline for Chapados (1.6); review potential exhibits, annotations, and specific exhibit inquiries for deposition (1.3).	2.90	575.00	1,667.50
10/07/19	JA	Prepare for (1.8), attend and conduct deposition Frederic Chapados (5.6); confer and strategize with Nicolas Bassett and Angie Herring regarding upcoming depositions and PREPA 9019 issues (.4); initial review of "dirty" transcript of Chapados (1.1)	8.90	575.00	5,117.50
10/08/19	JA	Telephonically attend deposition of David Skeel of FOMB in connection with PREPA RSA 9019 and in preparation of upcoming Brownstein Deposition (3.8); Continued review of Chapados deposition transcript to prepare for other CITI representative, Brownstein (2.4).	6.20	575.00	3,565.00
10/08/19	JA	Confer and strategize with Nicholas Bassett regarding PREPA RSA 9019 discovery and deposition.	0.10	575.00	57.50
10/10/19	JA	Review and analyze memorandum order re: Objections to Magistrate's Order on Motion to Compel and Motion to Strike (.4); review and analyze Skeel deposition in preparation of Brownstein deposition (2.3); continued review of Chapados rough deposition (.7); attention to additional discovery regarding Citi text messages (.3); review email correspondence from counsel for Citi regarding discovery completion (.1); review and analyze Order on Magistrate's Order [ECF 1652] (.6); and strategize regarding same concerning Brownstein deposition (.8); Revise Brownstein Deposition Outline (1.6)	6.80	575.00	3,910.00
10/11/19	ARD	Attend to background surrounding 9019.	0.90	625.00	562.50
10/11/19	JMS	Attention to preparation for CITI depositions in connection with PREPA RSA including PREPA Bond issues.	1.70	500.00	850.00
10/11/19	JA	Review and analyze deposition transcripts in preparation for Brownstein deposition with specific reference to court's order concluding discovery.	1.70	575.00	977.50

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10/13/19	JA	Review and analyze David Brownstein materials in anticipation of depositions (1.2) and revise extensive outline (1.4).	2.60	575.00	1,495.00
10/15/19	JA	Meet with financial advisor and Nick Bassett regarding pending RSA issues regarding 9019.	3.30	575.00	1,897.50
10/15/19	JA	Prepare for deposition of David Brownstein of Citi regarding PREPA RSA 9019.	4.20	575.00	2,415.00
10/16/19	MGG	Review Doc No. PREPA 1658 re: : Urgent Motion of Cortland Capital Market Services and Solus seeking leave to exceed the 35 page limitation for Responses and submit a joint objection in response to the Joint 9019 Motion and Doc No. PREPA 1664 request for entry of Fifth Revised Order Extending and Establishing Certain Deadlines (.20). Review Fifth Revised Order Modifying Certain Deadlines application to 9019 Moton (.20). Take note of new deadlines (.10).	0.50	575.00	287.50
10/16/19	JA	Prepare for, attend, and take deposition of David Brownstein, declarant in favor of PREPA RSA 9019 (11.7); continued analysis of Tolling Agreements and UCC participation (.6); analysis and strategy regarding requested Stay (.3); receive email correspondence from Sunni Beville of SCC regarding draft Complaint (.1); review Addendum to Tolling Agreement (.2).	12.90	575.00	7,417.50
10/17/19	ARD	Review documents and pleadings regarding PREPA joint 9019 motion regarding RSA.	3.10	625.00	1,937.50
10/18/19	ARD	Continued analysis of 9019 motion regarding affect on litigation.	1.20	625.00	750.00
10/18/19	AMC	Review proposed deadlines set forth in Urgent Motion concerning proposed restructuring support agreement [ECF No. 8868]	0.40	375.00	150.00
10/18/19	JZ	Continue drafting excel sheet listing payment transfers to the Fuel Supplier defendants for the 15, 10, 4 and 2 years prior to filing.	2.50	195.00	487.50
10/21/19	ARD	Review of RSA/9019 and related emails, pleadings regarding litigation.	2.90	625.00	1,812.50
10/21/19	MGG	Receipt and review email from Luc Despin with copy of Draft Objection to PREPA Settlement (128 Pages).	0.60	575.00	345.00
10/21/19	JA	Review Motion for Stipulated Protective Order (.2); review Order (.1).	0.30	575.00	172.50
10/21/19	JZ	Attention to stipulated protective order relating to C. Sobrino in the PREPA matter (.2); update electronic case profile (.1)	0.30	195.00	58.50
10/22/19	ARD	Attend to 9019 and objections thereto.	3.20	625.00	2,000.00
10/22/19	ARD	Conference with J. Arrastia and A. Castaldi regarding 9019 issues and potential impact on adversary proceedings.	1.10	625.00	687.50
10/22/19	ARD	Emails with J. Arrastia and A. Castaldi regarding litigation claims and potential impact from plan of adjustment.	0.40	625.00	250.00

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10/22/19	ARD	Follow up on RSA points regarding litigation claims.	0.30	625.00	187.50
10/22/19	ARD	Receive and review of comprehensive memorandum regarding 9019 and related pleadings for determination of claims.	0.50	625.00	312.50
10/22/19	JA	Confer with A. Day and Angelo Castaldi regarding analysis of RSA and potential impact on adversary proceedings (1.1).	1.10	575.00	632.50
10/22/19	JA	Review and analyze draft Objection to Settlement Agreement as limited to issues raised as special litigation counsel.	1.80	575.00	1,035.00
10/22/19	AMC	Meet and confer with A. Day and J. Arrastia concerning pending Rule 9019 motion and corresponding restructuring agreement and their impact on pending adversary proceedings	1.10	375.00	412.50
10/22/19	AMC	Review, analyze, and annotate joint status report and corresponding proposed order [DE 1361] concerning proposed RSA filed by government parties	1.60	375.00	600.00
10/23/19	ARD	Analysis of 9019 and RSA regarding litigation claims.	3.10	625.00	1,937.50
10/23/19	JA	Confer with Angelo Castaldi regarding potential comments to Committee objection to RSA 9019.	0.30	575.00	172.50
10/23/19	AMC	Review and analysis of proposed plan restructuring agreement and began review of objection to Rule 9019 motion	2.90	375.00	1,087.50
10/25/19	ARD	Continue review of 9019 documents regarding releases, exemptions.	2.70	625.00	1,687.50
10/25/19	JA	Review opposition to PREPA RSA 9019 relating to Puerto Rico Solar.	0.40	575.00	230.00
10/28/19	ARD	Attend to litigation claims and 9019 order.	1.30	625.00	812.50
10/28/19	JMS	Attention to proposed objection to 9019 and review impact on litigation (1.8)	1.80	500.00	900.00
10/30/19	JA	Review Brief opposing PREPA RSA 9019.	0.70	575.00	402.50
Subtotal: B190 / Other Contested Matters			110.10		\$61,008.50
B191 / General Litigation					
10/01/19	JHG	Review draft amended Fuel Oil complaint.	2.80	765.00	2,142.00
10/01/19	JHG	Review digest prepared by S. Siff to analyze and identify strategic litigation issues.	1.10	765.00	841.50
10/01/19	JHG	Review and analyze ECF 8790, UCC urgent objection to Magistrate September 16, 2019 order and record citations.	1.80	765.00	1,377.00

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10/01/19	JHG	Review First Circuit decision in Ponce appeal.	0.80	765.00	612.00
10/01/19	JHG	Review ECF 8775 reply of Puerto Sales Tax Financing Corp.	0.40	765.00	306.00
10/01/19	JHG	Review ECF 8783 tenth urgent motion to extension.	0.20	765.00	153.00
10/01/19	MGG	Review Committee's Urgent Objection to Magistrate Judge's September 16 Order Granting Protective Order with Respect to Deposition of Jose Ortiz.	0.30	575.00	172.50
10/01/19	MAF	Conference with J Arrastia regarding status of response to motion to intervene and amended complaint, overall strategy, next steps for amending the complaint (0.7); further emails with group concerning the same (0.4); review emails from J Arrastia (x3) regarding fuel oil contracts, regarding response to motion to intervene, and regarding preliminary analysis of confirmation issues (1.8); review and mark up revisions to draft amended fuel oil complaint (1.6).	4.50	550.00	2,475.00
10/01/19	JA	Legal research and analysis regarding Amended Complaint (1.4); review Tolling Agreements (.7); initial review and revise of Opposition to Motion to Intervene (1.2); strategize regarding sequencing of filings and case prosecution (.9); manage production of Amended Complaint and intervention issues (.8); confer with Juan Casillas regarding application of Puerto Rico law and prepare materials for review (1.2); confer and strategize with M. Friedman regarding strategic issues and litigation (.9).	7.10	575.00	4,082.50
10/01/19	AMC	Prepare response in opposition to motion to intervene (4.3), attend to revisions to said motion (1.1), and attend to supplemental research of authorities discussing Rule 24(a) and Rule 24(b) in the First Circuit and in the Bankruptcy Context (3.4)	8.80	375.00	3,300.00
10/01/19	IRS	Conduct legal analysis regarding breach of government contract claims under Puerto Rico law.	0.70	350.00	245.00
10/01/19	AMC	Attend telephone conference with counsel for the Special Claims Committee concerning pending litigation matters	0.90	375.00	337.50
10/01/19	IRS	Litigation update conference call with SCC counsel to discuss outstanding issues relating to the fuel oil litigation, proposed Citi settlement, and Walmart ADV.	0.90	350.00	315.00
10/02/19	JHG	Review daily summary prepared by S. Siff and analyze and identify strategic issues.	0.60	765.00	459.00
10/02/19	JHG	Review and analyze ECF 8244 in Case No. 17-3283 regarding applicability of litigation stay and mediation.	1.20	765.00	918.00
10/02/19	JHG	Review and analysis of ECF 34 in Case 00283 regarding amendment.	0.30	765.00	229.50
10/02/19	JHG	Review emails regarding extension to answer at request of Sussman.	0.20	765.00	153.00

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10/02/19	JHG	Review and analyze adversary 19-00283 and ECFs 35-38.	1.40	765.00	1,071.00
10/02/19	JA	Continued revision of Response to Motion to Intervene (1.8); receive correspondence from defense counsel Jim Reeder regarding enlargement of time to respond to Motion for Enlargement (.1) and strategize regarding same (.2).	2.10	575.00	1,207.50
10/02/19	MAF	Continue review of allegations of draft amended complaint and revise, reorganize, redraft the same (8.9)	8.90	550.00	4,895.00
10/02/19	AMC	Review redline edits to response to motion to intervene by J. Arrastia and M. Friedman (.4) and prepare revisions to said response (.5)	0.90	375.00	337.50
10/03/19	JHG	Review emails regarding RICO class plaintiffs intervening in PREPA action and consider strategic litigation issues.	2.20	765.00	1,683.00
10/03/19	JA	Confer with Jim Reeder regarding enlargement to respond (.2); review draft Fuel Oil Complaint (1.8); continued revision of Opposition to Motion to Intervene (1.3).	3.30	575.00	1,897.50
10/03/19	MAF	Continue review of allegations of draft amended complaint, consider comprehensive revisions to overall structure and specific allegations, and begin revisions, restructuring, redrafting the same; review of underlying support documentation relating to transfers to each of the defendants (3.0); email to A Castaldi and J Arrastia outlining and explaining proposed revisions to draft, suggesting additional revisions, topic, and themes to add to amendment (.4); consider overall case strategy and emails to AC and JA regarding the same (0.7); consider strategy in PREPA case issues related to adversary proceedings and proposed plan of adjustment, exchange emails with J Arrastia and A Castaldi regarding the same (0.8).	4.90	550.00	2,695.00
10/04/19	JHG	Review updated PREPA draft complaint.	2.30	765.00	1,759.50
10/04/19	MGG	Review email from Fatima Hassan Ali with copy of proposed Urgent Motion for Extension of Time to Respond to the Marrero Plaintiff's Motion to Intervene (.20). Email from John Arrastia and James Reeder, Jr. with clarification. (.10).	0.30	575.00	172.50
10/04/19	JA	Review of analysis of unsecured creditor claims relating to class action claims (.5); review class action filings relating to pending Motion to Intervene (1.0); strategize regarding damages of debtor (.6); confer with defendant counsel, Jim Reeder, regarding stipulation regarding enlargement (.2); review draft Motion for Enlargement (.1) and respond to counsel (.1); continued email correspondence with counsel drafting Stipulation for Enlargement (.1); continued revision of Amended Complaint (1.2); confer with M. Friedman and A. Castaldi regarding case issues (.6).	4.40	575.00	2,530.00

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10/04/19	MAF	Consider issues related to motion to intervene, email exchanges with J Arrastia and A Castaldi regarding fact questions related to the same (1.0); call with A Castaldi regarding class certification issues related to motion to intervene (0.5); call with J Arrastia regarding the same, status of multiple pending matters and next steps (0.4)	1.90	550.00	1,045.00
10/04/19	AMC	Review and analyze comments and revisions to proposed amended complaint (1.3), and prepare additional revisions consistent with said comments and revisions (4.6)	5.90	375.00	2,212.50
10/04/19	AMC	Review and analyze PREPA's claim registry and claims asserted therein and, in conjunction with said analysis, review class plaintiff proofs of claim	1.20	375.00	450.00
10/04/19	AMC	Confer with M. Friedman regarding issues related to Motion to Intervene (.6)	0.60	375.00	225.00
10/04/19	AMC	Confer with counsel for putative intervenors in Adv. No. 19-00388	0.20	375.00	75.00
10/04/19	AMC	Review and analysis of documents, filings, and other pertinent information relating to, arising from, and filed litigation removed by Vitol entities adverse to PREPA	2.30	375.00	862.50
10/06/19	JA	Confer with SCC counsel, Sunni Beville, regarding status of enlargement.	0.10	575.00	57.50
10/07/19	JHG	Review ECF 1649 regarding discovery in PREPA RSA settlement motion and analyze issues.	1.20	765.00	918.00
10/07/19	JHG	Review Doc 18 regarding extension in Marrero case and intervention.	0.70	765.00	535.50
10/07/19	MGG	Review Doc No. 1648- Reply in Support of Urgent Omnibus Motion by Cortland Capiralt to Compel Discovery Responses in Connection with PREPA RSA Settlement Motion (.20). Review Doc Nos. 1649 and 1649-1 re: Informative Motion by Cortland concerning Motion to Compel Discovery by the Government Parties (.10).	0.30	575.00	172.50
10/07/19	MAF	Review and mark up response to motion to intervene and conduct legal research in connection with the same	3.70	550.00	2,035.00
10/07/19	AMC	Detailed review and analysis of redline changes and comments made by M. Friedman and J. Suarez to draft amended complaint (2.2), and prepare revised amended complaint consistent with said revisions and comments (4.1)	6.30	375.00	2,362.50
10/07/19	AMC	Supplemental research of Puerto Rico and First Circuit authorities concerning predicate for breach of fiduciary duty claim	1.30	375.00	487.50
10/07/19	JNS	Confer with J.Zamora regarding preparation of exhibits to the Amended Complaint in the Fuel Oil adversary matter (.6); commence drafting excel workbooks listing the payment transfers to each defendant for the last 15, 10, 4 and 2 years (2.6)	3.20	75.00	240.00

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10/07/19	JZ	Receipt and review of the Motion for Extension of Time to file Response to the Motion to Intervene filed by Marrero Plaintiffs and circulate same (.3); receipt and review of the Order granting the Motion, circulate same, calendar response and reply deadline and update electronic case profile (.3)	0.60	195.00	117.00
10/07/19	JZ	Conferences with A. Castaldi and J. Sardina regarding preparation of exhibits to the Amended Complaint in the Fuel Oil adversary matter (.6); commence drafting excel workbooks listing the payment transfers to each defendant for the last 15, 10, 4 and 2 years (1.1)	1.70	195.00	331.50
10/08/19	JHG	Review issues regarding request for extension in Special Claims Committee v. Inspectorate Am. Corp., et al and conference with J. Arrastia regarding same.	0.60	765.00	459.00
10/08/19	JHG	Continued review of revised PREPA Fuel complaint.	2.80	765.00	2,142.00
10/08/19	JMS	Work on amended complaint with respect to breach of contract claims under Puerto Rico law against fuel oil defendants (2.3); call with SCC and follow up re same (1.3); strategize with J. Arrastia and M. Friedman (.3).	3.90	500.00	1,950.00
10/08/19	MAF	Exchange emails with group regarding upcoming calls (0.3); attend call regarding strategy for timing of amendment to fuel oil complaint and potential extensions and related issues (0.5); attend conference call with Ileana and A Castaldi with Vitol counsel regarding Rule 11 issues (0.3), follow up with A. Castaldi regarding the same (0.2)	1.30	550.00	715.00
10/08/19	JA	Conference call with SCC counsel, Sunni Belville, Rosa Sierra, Ileana Cardona regarding pending Fuel Oil Complaint, Rule 11 Motion, and case strategy (.5); strategize regarding Rule 11, amendment to Complaint, and enlargement (.4); confer with J. Suarez and M. Friedman (.3).	1.20	575.00	690.00
10/08/19	AMC	Research of federal bankruptcy authorities concerning principles of equitable tolling	2.10	375.00	787.50
10/08/19	AMC	Analyzed arguments set forth in Rule 11 distributed by Susman Godfrey, and attend to teleconference with counsel for the Special Claims Committee	1.90	375.00	712.50
10/08/19	AMC	Prepare revisions to amended complaint consistent with comments from J. Suarez	1.30	375.00	487.50
10/08/19	AMC	Prepare for and attend telephonic conference with counsel for Vitol and the Special Claims Committee (.4); confer with Mike Friedman (.2).	0.60	375.00	225.00
10/08/19	IRS	Analyze legal implications of a formal motion to stay with regards to the fuel oil class action complaint.	0.20	350.00	70.00
10/08/19	IRS	Analyze PREPA 9019 expert deposition testimony.	0.40	350.00	140.00
10/08/19	AMC	Confer with J. Zamora regarding excel spreadsheet preparation for use as exhibits.	0.70	375.00	262.50

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10/08/19	JZ	Continue drafting excel workbooks listing the payment transfers to each defendant for the last 15, 10, 4 and 2 years, numerous conferences with A. Castaldi regarding same.	4.10	195.00	799.50
10/09/19	JMS	Document review in support of preparation for Brownstein deposition.	4.20	500.00	2,100.00
10/09/19	JA	Strategize regarding implementation of Enlargement to Amend (.3); confer with SCC counsel. Rosa Sierra, regarding status and strategy of Motion to Intervene and Enlargement to Amend (.3); review and finalize draft motion (.1); correspondence with multiple defense counsel regarding enlargement (.4); review revised, amended motion (.2); confer with SCC counsel regarding possible Motion for Stay (.3).	1.60	575.00	920.00
10/09/19	AMC	Draft motion for extension of time concerning 19-388	1.40	375.00	525.00
10/09/19	AMC	Draft topics for deposition under Rule 1.310(b)(6) and attend to drafting letter to opposing counsel concerning the same	2.30	375.00	862.50
10/09/19	JZ	Assist in the Urgent Agreed Motion for Extension of Time to Answer Complaint	0.20	195.00	39.00
10/09/19	JZ	Finalize excel workbook transfers; e-mail links to A. Castaldi for review.	2.00	195.00	390.00
10/10/19	JHG	Review ECF 8821, reply regarding discovery in PREPA RSA settlement motion.	0.70	765.00	535.50
10/10/19	JHG	Review and analyze ECF 8822, informative motion regarding discovery and RSA settlement motion.	1.10	765.00	841.50
10/10/19	JMS	Document review in support of preparation for Brownstein deposition.	3.70	500.00	1,850.00
10/10/19	JA	Confer with SCC counsel, Rosa Sierra, regarding enlargement (.1); review court order granting enlargement (.1); review SCC Notice of Appearance (.1); review documents produced relating to proposed Citi settlement (.4); review draft production to mediation team (.8); review email regarding postponement of mediation (.1).	1.60	575.00	920.00
10/10/19	JZ	Receipt and review of the Urgent Agreed Motion Setting Deadline to File an Amended Complaint and for Extension of Time to Respond to the Plaintiffs' Complaint in the Fuel Oil adversary and circulate same (.2); receipt and review of the Order granting said motion, circulate same (.2) calendar response and reply deadline and update electronic case profile (.2)	0.60	195.00	117.00
10/11/19	ARD	Attend to Fuel Oil complaint.	0.60	625.00	375.00

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10/11/19	JA	Review memorandum regarding fuel oil issues from local counsel Juan Casillas (1.6); revise Fuel Oil Amendment (1.8) review draft Amended Complaint regarding insolvency allegations provided by SCC counsel (.8); review proposed Motion to Stay and strategize regarding same (.6); strategize with Mike Friedman and Angelo Castaldi regarding insurance pleading issues and strategize regarding the same (.6); Reveiw and strategize regarding SCC draft motion to stay and factual allegations (.7)	6.10	575.00	3,507.50
10/11/19	JMS	Continued work on amended complaint with special attention to laboratory defendants and potential D&O Claims.	3.70	500.00	1,850.00
10/11/19	MAF	Emails among J Arrastia and G Garno regarding pros and cons of potential additional claims for amended complaint, consider and advise group regarding legal and practical issues related to the same.	0.60	550.00	330.00
10/11/19	JA	Confer with M. Friedman and G. Garno regarding potential claims in amended complaint.	0.60	575.00	345.00
10/13/19	JA	Extensive revisions to Fuel Oil Complaint draft with respect to factual and legal allegations.	3.30	575.00	1,897.50
10/13/19	AMC	Prepare extensive revisions to draft amended complaint in Adv. Case No. 19-00388	7.30	375.00	2,737.50
10/14/19	ARD	Review documents and attend to Fuel Oil litigation.	2.50	625.00	1,562.50
10/14/19	JMS	Attention to issues relating to tolling agreements and UCC's inclusion regarding tolled parties, address issues related to amended complaints.	2.70	500.00	1,350.00
10/14/19	JMS	Attention to document review and discovery issues in anticipation of Brownstein deposition concerning PREPA 9019 (4.9); confer and strategize with M. Friedman (.7).	5.60	500.00	2,800.00
10/14/19	JA	Analyze Fuel Oil transfers for inclusion and reference in Amended Complaint draft (.6); strategize with Angelo Castaldi regarding revisions to Amended Complaint (.4); review and analyze Tolling Agreement and email correspondence to Sunni Belville of SCC regarding status with tolled defendants (.4); strategize regarding scope and nature of Tolling Agreements (.3); organize research and potential exhibits with SCC (.6); email correspondence to Sunni Belville of SCC regarding legal research and analysis regarding additional potential claims (.1); review draft of proposed Amended Complaint provided to SCC (.8); review deposition outline of Brownstein and key revised deposition outline to exhibits intended to be used at deposition (2.4).	5.60	575.00	3,220.00
10/14/19	MAF	Meeting to review current draft of amended complaint, consider and discuss potential legal issues and strategy relative to the same (1.7); conference with J Suarez regarding pending case issues and strategy (.7).	2.40	550.00	1,320.00
10/14/19	GMG	Review and comment on draft complaint (2.4); exchange emails and attention to issues re Prepa Fuel Oil Complaint (.4).	2.80	630.00	1,764.00

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10/14/19	AMC	Detailed review and analysis of tolling agreements applicable to specific entities (2.8); Prepare revisions to factual allegations component of draft amended complaint for filing in Adv. Case No. 19-388 (4.4); Revise fraudulent transfer allegations set forth in fraudulent transfer counts (.8); Conduct supplemental research concerning Paulian claims under Puerto Rican law (1.4); Conduct supplemental research concerning tolling principles (.7), and attend to further revisions of Puerto Rican statutory law claims (1.3)	11.40	375.00	4,275.00
10/15/19	AMC	Conduct research concerning principles of recovery under 11 U.S.C. s. 550	1.60	375.00	600.00
10/15/19	AMC	Research and analysis concerning personal jurisdiction and real-party-in-interest paradigms under federal rules of procedure	2.30	375.00	862.50
10/15/19	AMC	Review and analyze pleading and relation-back standards under Supreme Court and First Circuit precedent	1.70	375.00	637.50
10/15/19	IRS	Review draft amended fuel oil complaint and SCC Counsel comments.	1.80	350.00	630.00
10/15/19	JZ	Continue revising the Fuel Oil transfer exhibits to list transfers based on the payment date versus the invoice date in chronological order (2.5); conference with A. Castaldi regarding further revising the list for fuel type (.2)	2.70	195.00	526.50
10/16/19	ARD	Attend to Fuel Oil litigation and amended complaint.	2.60	625.00	1,625.00
10/16/19	JHG	Review ECF 8858, joint informative motion regarding Morales and Torres depositions relating to RSA.	0.30	765.00	229.50
10/16/19	MAF	Review most recent draft of amended complaint and evaluate and propose additional changes and comments.	2.30	550.00	1,265.00
10/16/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 2413 - 2476)	2.20	565.00	1,243.00
10/16/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 3 (Docs 2477 - 2500)	1.00	565.00	565.00
10/16/19	AMC	Detailed review and analysis of motion to stay prepared by Special Claims Committee, review of authorities cited therein, and strategize concerning the same	2.20	375.00	825.00
10/16/19	AMC	Continue preparation of most recent draft amended complaint for filing in the fuel oil litigation	2.00	375.00	750.00
10/16/19	AMC	Supplemental review of tolling agreement provisions, and prepare addendum to said agreement	2.30	375.00	862.50
10/16/19	AMC	Analyze terms and provisions of applicable tolling agreements pertaining to specific potential defendants	1.00	375.00	375.00
10/17/19	JHG	Review Doc No 8889 to correct deadlines regarding RSA.	0.40	765.00	306.00

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10/17/19	JA	Review analysis of Angelo Castaldi regarding Motion for Stay proposed by SCC (.2); revise next draft of Amended Fuel Oil Complaint (1.1); confer with Jesus Suarez regarding conference call with SCC during flight and unable to attend (.3); strategize with Jesus Suarez regarding conference with defendants while SCC requested an enlargement that unable to attend due to travel (.3); strategize regarding communications and resolution with SCC concerning Amended Complaint (.6); strategize regarding Stay (.3); email correspondence with May Orenstein regarding pending motions (.3); review and analyze additional points regarding revisions to Amended Complaints and revise same (.7); revise exhibits for draft complaint (.3); continued analysis of Tolling Agreements and SCC posture regarding effect on Amended Complaints (.4); confer with Angelo Castaldi regarding SCC requests for all factual research (.2); review and analyze Amended Complaint to incorporate revisions requested by SCC (1.2); review SCC revisions to Tolling Agreement Addendum and strategize regarding same (.3); receive correspondence from Sunni Belville (.1); strategize with M. Friedman and J. Suarez regarding tolling agreements (.2)	6.50	575.00	3,737.50
10/17/19	JMS	Prepare for and participate in conference call with SCC regarding amended complaint (1.7); follow-up with SCC concerning agreement on claims (1.5); research stipulation and determine UCC obligations (.7); prepare for and participate in conference call with defendants (.9) work on issues related to potential extension of time to resolve disputes with SCC as well as objections to proposed amended complaint (2.3); confer with M. Friedman regarding tolling agreements (.2)	7.30	500.00	3,650.00
10/17/19	MAF	Review emails among counsel for UCC and SCC concerning extensions, timing and length of stay, consider strategic decisions related to the same (0.4); call with A Castaldi to discuss the same and prepare for further conference with defendants and counsel for SCC (0.2); review emails among J Suarez and J Arrasita regarding UCC rights under tolling agreement and impact of the same on UCC position with respect to amended complaint (0.2); review stipulation to evaluate and understanding impact on UCC rights (1.0) ; attend call with UCC and SCC and Defense group attorneys to discuss extension of time to move to amend and potential stay of adversary proceeding (0.4); conference with J Arrastia and J Suarez regarding issues surrounding tolling agreement (0.2); review and mark-up revised version of amended complaint (revised to exclude certain claims and references) and email A Castaldi to discuss the same (2.3).	4.70	550.00	2,585.00
10/17/19	AMC	Continue preparation of revisions to amended complaint in Adv.P. 19-388	9.30	375.00	3,487.50
10/17/19	AMC	Telephone conference with counsel to the Special Claims Committee concerning stay and amended complaint issues, and follow-up analysis concerning the same	0.90	375.00	337.50
10/17/19	AMC	Prepare for and attend telephone conference with Co-Plaintiffs and Defendants regarding 19-388	0.60	375.00	225.00

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10/17/19	AMC	Review, analyze, and compile factual source material pertaining to amended complaint and confer with co-plaintiff counsel concerning the same	0.90	375.00	337.50
10/17/19	IRS	Review extensive correspondence regarding PREPA fuel oil amended complaint.	2.50	350.00	875.00
10/17/19	JZ	Conference with A. Castaldi regarding preparation of excel sheet of payment transfers for the Fuel Supplier defendants; commence drafting excel workbook for each defendant listing the transfers for the last 15, 10, 4 and 2 years.	2.00	195.00	390.00
10/18/19	JHG	Review ECF 8889, urgent motion regarding deadlines in RSA litigation.	1.00	765.00	765.00
10/18/19	JA	Review revised Amended Complaint (.6); strategize with Angelo Castaldi (.3); confer with Sunni Beville regarding extension from Vitol counsel (.1); email correspondence from and to counsel for Vitol (.3); review additional revision to amended draft (.3); extensive communications with counsel for SCC (M. Orenstein, T. Axelrod, R. Sierra, and S. Beville) regarding Fuel Oil Complaint, Tolling Agreements, pending Motion to Intervene and extensions) (1.2); confer with Jim Reeder regarding extension (.1); communication with defendants and SCC regarding revisions to Stipulation (.2).	3.10	575.00	1,782.50
10/18/19	JMS	Continued work on amendments to fuel oil complaint (1.6) and work on consensual resolution with SCC of dispute concerning claims asserted (1.8).	3.40	500.00	1,700.00
10/18/19	MAF	Review cover email from A Castaldi discussing revisions and raising issues in newest draft of amended complaint, and review the same (.9); further emails with GJB group and SCC counsel regarding draft (.4)	1.30	550.00	715.00
10/18/19	AMC	Review additional comments and revisions made by Michael Friedman to amended complaint, and prepare additional revisions to the same (3.1); strategize with J. Arrastia (.3)	3.40	375.00	1,275.00
10/18/19	JZ	Review of revised Fuel Oil amended complaint drafted by A. Castald (.6); attention to numerous e-mails regarding revisions and inquiries (.3); conference with A. Castaldi regarding additional exhibits (.2)	1.10	195.00	214.50
10/18/19	JZ	Receipt and review of Motion for Extension of Time to file amended complaint in the Fuel Oil adversary (.2); circulate same and update electronic case profile (.1).	0.30	195.00	58.50
10/20/19	JA	Review, edit, and substantially revise remainder of arguments of draft Opposition to Motion to Intervene,	2.60	575.00	1,495.00
10/21/19	JHG	Review draft objection to PREPA settlement motion regarding Restructuring Support Agreement.	3.60	765.00	2,754.00

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10/21/19	JA	Correspondence from and to counsel for Vitol regarding good faith conference (.2); strategize with Mike Friedman regarding insolvency allegations proposed by SCC counsel (.4); analyze additional allegations and revisions proposed by SCC (.6); confer with SCC regarding conference with Vitol defendants (.2); confer with SCC regarding opposition to Motion to Intervene (.1); confer with fuel oil defendants regarding opposition to Marrero Motion to Intervene (.1); review and analyze revised draft Opposition to Marrero Motion to Intervene (1.1); telephone call with James Reeder regarding Motion to Intervene (.2); strategize with Jesus Suarez regarding Tolling Agreements (.3).	3.20	575.00	1,840.00
10/21/19	JMS	Follow-up concerning VITOL Rule 11 issues (.7) and attention to amendments to complaint concerning correction of same (1.4)	2.10	500.00	1,050.00
10/21/19	MAF	Review email from J Arrastia with questions concerning insolvency allegations in revised amended complaint, consider issues related to the same and draft email addressing issues (0.9); review and mark-up draft response to class plaintiffs' motion to intervene, conduct legal research regarding the same, and email A Castaldi and J Arrastia to discuss and explain changes (4.9).	5.80	550.00	3,190.00
10/21/19	AMC	Conduct substantial research of bankruptcy and federal authorities applying Rule 19 generally and Rule 19(a)(1)(B)(i) specifically	2.10	375.00	787.50
10/21/19	AMC	Prepare substantial revisions to response in opposition to motion to intervene, and review / analysis of detailed revisions made by Mssrs. Arrastia and Friedman	6.30	375.00	2,362.50
10/21/19	JZ	Commence drafting excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for the 15, 10, 4 and 2 years prior to filing.	1.00	195.00	195.00
10/21/19	JZ	Receipt and review of Order Granting Motion for Extension of Time to file amended complaint in the Fuel Oil adversary (.1); calendar response and reply deadline and update electronic case profile (.2)	0.30	195.00	58.50
10/22/19	JA	Prepare and revise Opposition to Fuel Oil Complaint (.8).	0.80	575.00	460.00
10/22/19	AMC	Review and analyze jurisdictional allegations of draft amended complaint in Adv. Pr. 19-388	0.80	375.00	300.00
10/23/19	JMS	Prepare for and participate in call with VITOL regarding amendment of claims (1.3); attention to revisions to fuel oil complaint and issues with tolled parties (1.6); review matters related to intervention motion (.8); confer with J. Arrastia and M. Friedman (.4)	4.10	500.00	2,050.00
10/23/19	MAF	Conference call with J Arrastia regarding J Suarez regarding SCC response to UCC position with respect to class motion to intervene (0.4); attend conference call with SCC and UCC group and defense group regarding draft amended complaint (0.2); follow up conference call with UCC group regarding the same (0.1).	0.70	550.00	385.00

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10/23/19	JA	Prepare for and conduct call with Vitol defendants (.6); telephone conference with SCC regarding Fuel Oil Complaint amendment, Motion to Intervene and case strategy (.3); review updated draft of Opposition to Motion to Intervene (.8).	1.70	575.00	977.50
10/23/19	AMC	Attend to separate conference calls with Special Claims Committee, and counsel for Vitol re: Adv. Proc. No. 19-388	0.80	375.00	300.00
10/24/19	JHG	Review and analysis of final draft of amended Fuel Oil complaint.	4.70	765.00	3,595.50
10/24/19	JHG	Review and analyze draft response to motion to intervene by class action plaintiffs.	3.40	765.00	2,601.00
10/24/19	JMS	Continued research in support of motion to intervene (1.3); review issues related to amended complaint and inclusion of tolled parties in Fuel Oil Complaint (1.8)	3.20	500.00	1,600.00
10/24/19	JA	Review and analyze draft litigation and expert materials relating to PREPA RSA 9019 co-prosecuting.	2.70	575.00	1,552.50
10/24/19	CBH	Preparation of table of contents and formatting for response to motion to intervene in Fuel Oil case(.7); meeting with J. Zamora regarding same (.4).	1.10	195.00	214.50
10/24/19	JNS	Work drafting spreadsheet containing Saybolt defendant transfers amounts and dates.	5.70	75.00	427.50
10/24/19	JZ	Continue drafting excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for the 15, 10, 4 and 2 years prior to filing.	1.00	195.00	195.00
10/25/19	JA	Review and analyze SCC draft Opposition to Motion to Intervene (.7); confer with SCC counsel regarding opposition (.1); confer and strategize with Angelo Castaldi regarding finalization of Opposition (.4); finalize Opposition to Motion to Intervene and file (1.9).	3.10	575.00	1,782.50
10/25/19	JNS	Continue drafting excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for the 15, 10, 4 and 2 years prior to filing.	4.60	75.00	345.00
10/25/19	JZ	Assist in revising and formatting the objection to Marrero Plaintiff's Motion to Intervene; attend conferences with regard to same; finalize and file same; update electronic case profile.	1.40	195.00	273.00
10/25/19	JZ	Receipt and review of the Objection to Motion to Intervene filed by the SCC (.2); receipt and review of Defendants' Objection to Motion to Intervene (.2); circulate same and update electronic case profile (.2)	0.60	195.00	117.00
10/26/19	JA	Review and analyze Oppositions to Motion to Intervene filed by other parties	1.20	575.00	690.00
10/28/19	JMS	Continued work on amendments to Fuel Oil Complaint (2.9)	2.90	500.00	1,450.00
10/28/19	IRS	Review docket entry updates from S. Siff.	0.40	350.00	140.00

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10/28/19	JNS	Continue work drafting excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for several years for the 15, 10, 4 and 2 years prior to filing.	7.10	75.00	532.50
10/28/19	JNS	Review email from John Arrastia, prepare working binder including Answers/Counter claims filed in the 19-00356, 19-00357; 19-00359, 19-00361, 19-00366 and 19-00369. Save files and circulate documents to counsel.	1.30	75.00	97.50
10/28/19	JZ	Continue drafting excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for the 15, 10, 4 and 2 years prior to filing.	5.20	195.00	1,014.00
10/29/19	MAF	Conference with A Castaldi to discuss legal issues surrounding potential stay of third party litigation, discussion of particular case law, consider issues and provide direction for next steps, draft and send follow up email to A Castaldi memorializing the same (0.7)	0.70	550.00	385.00
10/29/19	JA	Review correspondence from IEEFA regarding PREPA RSA.	0.80	575.00	460.00
10/29/19	JZ	Finalize excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for the 15, 10, 4 and 2 years prior to filing.	1.80	195.00	351.00
10/29/19	JNS	Continue drafting excel sheet from a voluminous PDF document which list the payment transfers to Saybolt for several years for the 15, 10, 4 and 2 years prior to filing. Verify amounts and totals.	6.60	75.00	495.00
10/30/19	JMS	Provide comments regarding revised Fuel Oil Complaint (1.7); attention to management of SCC objections (.6); review matters relating to identification of parties (.4); review issues concerning tolling agreements (.9); review preparation of exhibits and timeline for filing same (1.3)	4.50	500.00	2,250.00
10/30/19	JA	Receive and review SCC comments to Amended Complaint draft (.6); review analysis by Angelo Castaldi (.8); correspondence to SCC counsel regarding revisions (.2)	1.60	575.00	920.00
10/30/19	AMC	Detailed review and analysis of revisions and comments made by co-plaintiffs' counsel to amended complaint in Adv. 19-388 (1.2), respond to such revisions and comments (2.1), and review of factual bases for such complaint further to this review process (1.1)	4.40	375.00	1,650.00
10/31/19	MGG	Review various objections (1696, 1698, 1700 and 1701) to Joint Motion of PREPA and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 928, and Bankruptcy Rules 3012(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement [PREPA 1235].	0.70	575.00	402.50
10/31/19	JMS	Review issues concerning amendment to fuel oil complaint (1.8); attention to preparation of exhibits regarding same (1.3); review issues concerning identification of parties and tolling agreements (1.6); review issues concerning requests from SCC concerning revisions to the complaints (.7)	5.40	500.00	2,700.00

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10/31/19	JA	Review objection to PREPA RSA 9019 objection (.8); review declaration submitted for support (.4); review materials submitted in support of UCC PREPA RSA 9019 (1.8); review objection to extend all deadlines (.1); review fee examiner objection (.4); review PREPA RSA 9019 objection of Utier (.8); review U.S. Bank reservation of rights (.2); review fuel line leader objection (1.1)	5.60	575.00	3,220.00
10/31/19	JA	Review analysis prepared by SCC regarding legal research relating to proposed amended complaint (.4); review correspondence from May Orenstein (.1); review draft amended complaint and comments from SCC counsel (.4); review additional correspondence from May Orenstein (.1); revise amended complaint (.4); review blacklined complaints (.4); review counterclaim revisions (.6)	2.40	575.00	1,380.00
10/31/19	IRS	Review extensive correspondence from co-counsel regarding PREPA fuel oil claims.	0.80	350.00	280.00
10/31/19	AMC	Prepare substantial revisions to amended complaint for filing in Adv. Case No. 19-388	6.80	375.00	2,550.00
Subtotal: B191 / General Litigation			392.50		\$179,683.00
B195 / Non-Working Travel					
10/06/19	JA	Travel to NYC for deposition of Citi representative, Frederic Chapados. [TRAVEL BILLED AT 50% RATE]	5.60	287.50	1,610.00
10/08/19	JA	Travel from New York to Miami after Chapados deposition in connection with PREPA RSA 9019. [TRAVEL BILLED AT 50% RATE]	5.40	287.50	1,552.50
10/15/19	JA	Travel from Miami to New York for deposition of David Brownstein re: PREPA RSA 9019. [TRAVEL BILLED AT 50% RATE]	6.20	287.50	1,782.50
Subtotal: B195 / Non-Working Travel			17.20		\$4,945.00
B260 / Meetings of and Communications with Board					
10/01/19	JA	Confer with SCC regarding Fuel Oil Complaint, Rule 11, and other pending items.	0.70	575.00	402.50
Subtotal: B260 / Meetings of and Communications with Board			0.70		\$402.50
Total			528.70		\$249,344.00

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
ARD	Allison R Day	Sr. Partner	26.40	625.00	16,500.00
JHG	John H Genovese	Sr. Partner	35.80	765.00	27,387.00
JA	John Arrastia	Partner	17.20	287.50	4,945.00
JMS	Jesus M Suarez	Partner	65.90	500.00	32,950.00
MAF	Michael A Friedman	Partner	43.70	550.00	24,035.00
ALG	Alfredo L Gonzalez	Partner	3.20	565.00	1,808.00
MGG	Mariaelena Gayo-Guitian	Partner	5.60	575.00	3,220.00
JA	John Arrastia	Partner	144.30	575.00	82,972.50
GMG	Greg M Garno	Partner	2.80	630.00	1,764.00
IRS	Irina R Sadovnic	Associate	7.70	350.00	2,695.00
AMC	Angelo M Castaldi	Associate	112.80	375.00	42,300.00
JNS	Jessey N Sardina	Paralegal	29.80	75.00	2,235.00
CBH	Colleen B Hopkins	Paralegal	1.10	195.00	214.50
JZ	Johana Zamora	Paralegal	32.40	195.00	6,318.00
Total			528.70		\$249,344.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	139.20
	Pacer - Online Research	16.40
10/15/2016	Hotel 2 nights in NYC Shoreham Hotel David Brownstein Deposition (12272-002) @ \$500 per night John Arrastia	1,000.00
10/03/2019	Airfare round trip Miami to New York - unilateral cancellation of deposition of Chapados/ Prepa 9019 10/1 - 10/3 (12272-002) John Arrastia	421.60
10/06/2019	Airfare rounttrip Miami to New York - Chapados deposition / Prepa 9019 10/6 -10/8 (12272-002) John Arrastia	356.60
10/06/2019	Ground Transportation - Uber in NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	46.07
10/06/2019	Meals Halal Paradise NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	11.50
10/07/2019	Sheraton Hotel 2 nights and tip NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	620.93
10/07/2019	Meals BBQ Chicken NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	14.42
10/08/2019	Meals Starbucks NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	3.90
10/08/2019	Ground Transportation taxi to hotel NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	49.70
10/08/2019	Parking in Miami for NYC Chapados deposition Prepa 9019 (12272-002) John Arrastia	34.00
10/15/2019	Airfare Miami to NY round trip American Airlines - David Brownstein Deposition (12272-002) John Arrastia	605.34
10/15/2019	Ground Transportation Uber from airport to office of Financial advisor for depo preparation David Brownstein Deposition (12272-002) John Arrastia	43.78
10/16/2019	Meals 55th and 6th shop #4 - dinner David Brownstein Deposition (12272-002) John Arrastia	22.76

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10/17/2019	Meals breakfast Dunkin Donuts David Brownstein Deposition (12272-002) John Arrastia	3.04
10/17/2019	Ground Transportation Uber from hotel to airport NYC David Brownstein Deposition (12272-002) John Arrastia	92.62
10/19/2019	Parking Airport David Brownstein Deposition (12272-002) John Arrastia	34.00
Total Costs incurrent and advanced		<hr/> \$3,515.86
Current Fees and Costs		<hr/> \$252,859.86

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019
Please Refer to
Invoice Number: 96487

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Oct 31, 2019

18,784.00

Costs incurred and advanced

26.85

Current Fees and Costs Due

18,810.85

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019

Please Refer to

Invoice Number: 96487

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Oct 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
10/27/19	JA	Confer and strategize with Nick Bassett regarding status of ERS matters in anticipation of conference call with FOMB and SCC.	0.20	575.00	115.00
Subtotal: B110 / Case Administration			0.20		\$115.00
B160 / Fee/Employment Applications					
10/10/19	MGG	Receipt and review email from Ken Forrest with copy of August invoice.	0.20	575.00	115.00
10/17/19	MGG	Review September invoices.	0.30	575.00	172.50
Subtotal: B160 / Fee/Employment Applications			0.50		\$287.50
B191 / General Litigation					
10/02/19	JA	Review various orders clarifying effect of prior orders and establishing objection procedures.	0.20	575.00	115.00
10/08/19	AMC	Review and analysis of third amended complaints filed in challenged-bond adversaries	0.70	375.00	262.50
10/08/19	JZ	Receipt and review of Order Establishing Initial Procedures with regard to the ERS bond objections entered in ADV. Case no. 19-355, 19-356, 19-357, 19-359, 19-360, 19-361; calendar deadlines; update master tracking sheet; update electronic case profile; update each electronic case profile.	0.60	195.00	117.00
10/09/19	AMC	Review of Court's order [ECF No. 8818] establishing procedures with respect to objections to ERS claim holders, as applied to various adversary proceedings in which the Firm acts as special litigation counsel	0.70	375.00	262.50

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10/09/19	JZ	Receipt of e-mail from Paul Hastings regarding ERS Bond Procedures Order (.1); file Notice of Initial Procedures in Case No. 19-00361, 19-00359, 19-00357, 19-00356 and 19-00355 (.4); update electronic case profile (.2); e-mail to J. Arrastia regarding service of same and attention to e-mails between J. Arrastia and Paul Hastings regarding service via Prime Clerk (.2)	0.80	195.00	156.00
10/10/19	AMC	Confer with counsel for adversary defendant in case no. 19-355 and attend to follow-up communication concerning discovery process	0.60	375.00	225.00
10/10/19	AMC	Review and analyze Rule 2004 discovery process vis-a-vis adversary defendants, and, in conjunction therewith analyze analyze procedures requested in Urgent Motion of the Financial Oversight and Management Board of Puerto Rico to Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and Compelling Disclosure of Lists of Security Holders (Dkt. No. 6854), and order granting same	1.80	375.00	675.00
10/15/19	AMC	Communicate with counsel for Och Ziff (advesary defendant)	0.10	375.00	37.50
10/21/19	MGG	Review Doc No. ERS 681 re: Urgent Joint Motion to Modify Order Regarding Stay and Mandatory Mediation with Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico(ECF 8899, ERS 680) (.20). Consider impact on briefing schedule with Respect to Certain Issues (.20).	0.40	575.00	230.00
10/22/19	AMC	Review, analyze, and work to resolve numerous information requests from opposing counsel concerning DTC accounts, CUSIP information, and transfer / transaction data	1.40	375.00	525.00
10/24/19	JZ	Receipt and review of Order Granting Motion to Modify Stay Order entered in the ERS adversary matters; calendar all deadlines; update electronic case profiles.	0.80	195.00	156.00
10/26/19	JA	Receive and review Answers and Affirmative Defenses of multiple ERS defendants.	1.40	575.00	805.00
10/28/19	JMS	Attention to issues arising from ERS litigation and preparation of answers, affirmative defenses to counterclaim.	3.60	500.00	1,800.00
10/28/19	JMS	Review analysis from DCG concerning vendor actions (Mangual) and provide recommendation (1.3). Review issues relating to Citi Analysis re same (.8)	2.10	500.00	1,050.00
10/28/19	JA	Review and analyze draft responses to ERS Clawback Contractors (1.7); confer with Tristan Axelrod (.2); continued analysis of counterclaims (.8); analyze Affirmative Defenses and Responses (.6)	3.30	575.00	1,897.50
10/28/19	AMC	Review and discuss litigation strategy concerning counterclaims filed in pending ERS adversary proceedings	0.60	375.00	225.00

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10/28/19	AMC	Reviewed and analyzed draft answer and affirmative defenses to counterclaim of Oaktree-Forest Multi Strategy (1.6), and review of Pension Funding Bond Resolution of 2008 consistent therewith (1.2)	2.80	375.00	1,050.00
10/28/19	JZ	Review and discuss strategy concerning counterclaims filed in pending ERS adversary proceedings.	0.40	195.00	78.00
10/29/19	JMS	Continued review of issues arising from ERS litigation and preparation of answers, affirmative defenses to counterclaim.	3.40	500.00	1,700.00
10/29/19	JA	Call with other Respondents to ERS counterclaims regarding planning (.4); review revised Answer draft (.6); review draft interrogatories, requests for production and requests for admissions (1.3).	2.30	575.00	1,322.50
10/29/19	AMC	Review and analyze working draft of the Answer to the various counterclaims	1.30	375.00	487.50
10/29/19	AMC	Participate in global conference call to discuss with debtor representatives and committee representatives litigation strategies concerning pending ERS adversary proceedings	0.50	375.00	187.50
10/30/19	JA	Confer and strategize with Tristan Axelrod of SCC to avoid duplication (.2); conform exemplar to other pending clawback actions (.6) revise answers to counterclaims (.2); review comments on draft discovery (.3)	1.30	575.00	747.50
10/30/19	AMC	Detailed review and analysis of answers and counterclaims filed by counterclaimants in challenged bond adversary proceedings	4.70	375.00	1,762.50
10/30/19	JZ	Strategize concerning formulating answers to counterclaims filed in pending ERS adversary proceedings; compare answers filed by different defendants; draft form answers in Adversary cases 19-357, 19-361 and two answers in 19-367; e-mail same to I. Sadovnic for review.	3.10	195.00	604.50
10/31/19	MGG	Review email from Tristan Axelrod with upcoming administrative filings in the clawback litigation. Review list of proposed dismissals. (.40). Review additional defendants for inclusion in amended complaint. (.10)	0.50	575.00	287.50
10/31/19	JA	Review additional comments on draft discovery (.4); strategize with Irina Sadovnic regarding revisions to answers (.6); review notices of dismissal (.2); Strategize with Tristan Axelrod regarding clawback action (.1); confer with Will Dalsen of Proskauer regarding answers in AP367 (.1); review additional comments to discovery (.4)	1.80	575.00	1,035.00
10/31/19	JZ	Continue assistance in answering and revising counterclaims filed in pending ERS adversary proceedings; compare answers filed by different defendants; draft form answers in Adversary cases 19-356 and two answers in 19-359; e-mail same to I. Sadovnic for review.	1.50	195.00	292.50
Subtotal: B191 / General Litigation			42.70		\$18,094.00

B260 / Meetings of and Communications with Board

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 96487

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10/27/19	JA	Telephone conference regarding case strategy; pleading preparation and discovery to various counterclaims with Margaret Dale, Nick Bassett, Tristan Axelrod, etc.	0.50	575.00	287.50
Subtotal: B260 / Meetings of and Communications with Board			0.50		\$287.50
Total			43.90		\$18,784.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	9.10	500.00	4,550.00
MGG	Mariaelena Gayo-Guitian	Partner	1.40	575.00	805.00
JA	John Arrastia	Partner	11.00	575.00	6,325.00
AMC	Angelo M Castaldi	Associate	15.20	375.00	5,700.00
JZ	Johana Zamora	Paralegal	7.20	195.00	1,404.00
Total			43.90		\$18,784.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	26.85
Total Costs incurrent and advanced		\$26.85
Current Fees and Costs		\$18,810.85

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019
Please Refer to
Invoice Number: 96488

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Oct 31, 2019	115.00
Costs incurred and advanced	
Current Fees and Costs Due	115.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

December 17, 2019

Please Refer to

Invoice Number: 96488

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Oct 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B160 / Fee/Employment Applications					
10/17/19	MGG	Review September invoices.	0.20	575.00	115.00
Subtotal: B160 / Fee/Employment Applications			0.20		\$115.00
Total			0.20		\$115.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
MGG	Mariaelena Gayo-Guitian	Partner	0.20	575.00	115.00
Total			0.20		\$115.00

Current Fees and Costs

\$115.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2020
Please Refer to
Invoice Number: 96724

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Nov 30, 2019	305,501.50
Costs incurred and advanced	<u>7,233.83</u>
Current Fees and Costs Due	312,735.33

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2020

Please Refer to

Invoice Number: 96724

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Nov 30, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
11/19/19	JZ	Revise master Defendant excel list to categorize the defendants dismissed per Notices of Dismissals and/or corrected appendixes filed in several adversary cases.	2.10	195.00	409.50
11/25/19	JHG	Review ECF 9302 regarding rate increases.	0.20	765.00	153.00
11/25/19	JHG	Review email from Alex Bongartz regarding payment of administrative expenses.	0.30	765.00	229.50
11/25/19	JA	Review materials for Committee meeting.	0.60	575.00	345.00
Subtotal: B110 / Case Administration			3.20		\$1,137.00
B113 / Pleadings Review					
11/01/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on October 31 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/01/19	SS	Prepare digest of matters and filings late on October 31 relevant to special litigation counsel and distribute to appropriate team members. Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings and prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/01/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00

PROMESA - Official Committee of Unsecured Creditors
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11/01/19	SS	Prepare digest of matters and filings on November 1 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/02/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on November 1 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
11/04/19	SS	Completed Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 1 through November 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/04/19	SS	Prepare digest of matters and filings from late November 1 through November 3 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/04/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/04/19	SS	Prepare digest of matters and filings on November 4 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/05/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/05/19	SS	Prepare digest of matters and filings from late November 4 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/05/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/05/19	SS	Prepare digest of matters and filings on November 5 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
11/06/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings, late on November 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/06/19	SS	Prepare digest of matters and filings late on November 5 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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11/06/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/06/19	SS	Prepare digest of matters and filings on November 6 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
11/07/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/07/19	SS	Prepare digest of matters and filings late on November 6 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/07/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 7 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/07/19	SS	Prepare digest of matters and filings on November 7 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
11/08/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on November 7 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/08/19	SS	Prepare digest of matters and filings from late on November 7 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/08/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 8 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/08/19	SS	Prepare digest of matters and filings on November 8 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/11/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 8 through November 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/11/19	SS	Prepare digest of matters and filings from late November 8 through November 10 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/11/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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11/11/19	SS	Prepare digest of matters and filings on November 11 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
11/12/19	MGG	Receipt and review the Magistrate's Order Granting Motion to Seal for Limited Duration and for Supplemental Briefing, entered on the Urgent Motion to File under Seal Official Committee of Unsecured Creditors' Objection to Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928 and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in Restructuring Support Agreement and the Order granting the UCC's Urgent Motion to Seal (ECF 9126) on a temporary basis.	0.30	575.00	172.50
11/12/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings, late on November 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/12/19	SS	Prepare digest of matters and filings from late November 11 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/12/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/12/19	SS	Prepare digest of matters and filings on November 12 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/13/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/13/19	SS	Prepare digest of matters and filings from late November 12 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
11/13/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from November 13 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
11/13/19	SS	Prepare digest of matters and filings on November 13 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/14/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 13 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00

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11/14/19	SS	Prepare digest of matters and filings from late November 13 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/14/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 14 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/14/19	SS	Prepare digest of matters and November 14 filings relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/15/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 14 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/15/19	SS	Prepare digest of matters and filings from late November 14 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/15/19	SS	Prepare digest of matters and filings from November 15 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/15/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 15 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/16/19	SS	Began to review and analyze all court filings on late November 15 in the Main Case, Title III cases and Adversary Proceedings in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/18/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 15 through November 15 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/18/19	SS	Prepare digest of matters and filings from late November 15 through November 17 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/18/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
11/18/19	SS	Prepare digest of matters and filings on November 18 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00

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11/19/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/19/19	SS	Prepare digest of matters and filings from late November 18 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
11/19/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/19/19	SS	Prepare digest of matters and filings on November 19 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
11/20/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
11/20/19	SS	Prepare digest of matters and filings from late November 19 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/20/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
11/20/19	SS	Prepare digest of matters and filings on November 20 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/21/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
11/21/19	SS	Prepare digest of matters and filings from late November 20 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/21/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 21 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/21/19	SS	Prepare digest of matters and filings on November 21 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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11/22/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on November 21 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/22/19	SS	Prepare digest of matters and filings from late November 21 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/22/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/22/19	SS	Prepare digest of matters and filings on November 22 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/25/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 22 through November 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
11/25/19	SS	Prepare digest of matters and filings from late November 22 through November 24 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/25/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
11/25/19	SS	Prepare digest of matters and filings on November 25 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/26/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on November 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/26/19	SS	Prepare digest of matters and filings from late November 25 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
11/26/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/26/19	SS	Prepare digest of matter and filings on November 26 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00

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11/27/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on November 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/27/19	SS	Prepare digest of matters and filings from late on November 26 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
11/27/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on November 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
11/27/19	SS	Prepare digest of matters and filings on November 26 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
11/30/19	SS	Began review and analysis of all court filings in the Main Case, Title III cases and Adversary Proceedings late on November 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
Subtotal: B113 / Pleadings Review			118.70		\$23,260.50
B150 / Meetings of Creditors					
11/11/19	JA	Confer with Committee.	0.40	575.00	230.00
11/12/19	JA	Prepare correspondence to Committee regarding status update.	0.30	575.00	172.50
11/13/19	JA	Prepare for (.3) and attend conference call with Committee (.7)	1.00	575.00	575.00
11/15/19	JMS	Prepare for and participate in call with Committee.	1.10	500.00	550.00
11/17/19	JA	Confer with Jesus Suarez regarding agenda for committee meeting (.3); Prepare agenda for committee meeting (.4)	0.70	575.00	402.50
11/17/19	JMS	Strategize with J. Arrastia re: Committee meeting agenda.	0.30	500.00	150.00
11/18/19	JA	Prepare agenda for Committee meeting on litigation issues.	0.30	575.00	172.50
11/19/19	JA	Prepare Memorandum to Committee regarding pending legal issues.	0.80	575.00	460.00
11/20/19	JA	Prepare for (.9) and participate in Committee Hearing (2.7) including litigation update and strategy.	3.60	575.00	2,070.00
11/20/19	JMS	Prepare for and participate in committee call and review pending litigation issues, follow up on committee requests.	2.90	500.00	1,450.00
11/23/19	JA	Strategize and prepare communication to Committee regarding case strategy.	0.80	575.00	460.00

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11/26/19	JA	Call with Committee regarding litigation issues.	0.60	575.00	345.00
11/27/19	JA	Confer with Committee regarding pending Walmart Adversary proceeding.	0.20	575.00	115.00
Subtotal: B150 / Meetings of Creditors			13.00		\$7,152.50
B160 / Fee/Employment Applications					
11/01/19	MGG	Review and finalize August Fee Statement letter.	0.40	575.00	230.00
11/01/19	MGG	Conference with C. Hopkins re: Compensation Disclosure and reports for 2nd Interim Fee Application.	0.50	575.00	287.50
11/01/19	CBH	Continue preparation of second interim fee application (.5); preparation of exhibit E-1 summary of compensation requested by project category (1.0); preparation of further breakdown of compensation requested by project category and matter (1.0); continue preparation of exhibit F breakdown of monthly invoices (.5); continue preparation of breakdown of hourly time in fee application (.8).	3.80	195.00	741.00
11/04/19	MGG	Review invoices and reports for 2nd Interim Fee application (1.50). Review and revise draft copy of 2nd Interim Fee application (1.70). Conference with C. Hopkins re: reports and attachments required (.50).	3.70	575.00	2,127.50
11/04/19	MGG	Review and follow up with Hacienda for payment of ten (10%) holdback approved by Fee Order.	0.30	575.00	172.50
11/04/19	CBH	Attention to holdbacks on prior fee application (.4); request copies of report (.3); meeting with M. Guitian regarding preparation of fee application; entry of order on first interim fee application and holdbacks (.4).	1.10	195.00	214.50
11/05/19	MGG	Email to and from John Arrastia re: service of fee statements for September 2019 and upcoming deadlines.	0.30	575.00	172.50
11/05/19	CE	Preparation of August 2019 Fee Statement; Calendar objection deadline; Interoffice meeting with M. Guitian re: same.	0.60	150.00	90.00
11/05/19	CBH	Continue preparation of second interim fee application (.5); edits to exhibits (.5).	1.00	195.00	195.00
11/07/19	MGG	Continue review and preparation of Second Interim Fee Application (1.0). Office conference with C. Hopkins re: summary of fees paid and outstanding (.40). Review accounting reports re: fees paid, pending and holdbacks (.50).	1.90	575.00	1,092.50
11/07/19	MGG	Review initial draft of Second Interim Fee Application.	1.40	575.00	805.00

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11/07/19	CBH	Continue preparation of second interim fee application (.4); attention to breakdown of task codes for matters 001-005 (1.0); edits to J. Genovese declaration (.5); continue preparation of exhibits; including breakdown of September fee and expenses (.6); e-mail correspondence with accounting regarding specific reports (.4).	2.90	195.00	565.50
11/08/19	MGG	Continue review and revisions to Second Interim Fee Application (1.0). Insert and revise factual background (.70). Review and revise description of litigation matters being handled by GJB (1.0). Review and discuss with C. Hopkins summary of amounts paid and outstanding (1.0),.	3.70	575.00	2,127.50
11/08/19	CBH	Continue preparation of second interim fee application (.4); edits and additions to exhibits (.8); add information to case background (.5); review of first interim fee order (.4); e-mail correspondence with M. Guitian regarding review of fee application (.3).	2.40	195.00	468.00
11/12/19	MGG	Review and comment updated and revised draft of Second Interim Fee Application. (1.40). Review summary of amounts billed and paid (1.0).	2.40	575.00	1,380.00
11/13/19	JHG	Review pending fee application payment issues.	0.60	765.00	459.00
11/13/19	MGG	Continue preparation and development of descriptions for Second Interim Fee Application (2.50). Conference with C. Hopkins re: draft Fee Application (.30).	2.80	575.00	1,610.00
11/13/19	MGG	Review of April and May Fee Statements and holdback amounts (.40). Review Omnibus Order Awarding Interim Fee Amounts (.20). Prepare detail correspondence with Valerie Soler with request for payment of holdback amounts for April and May 2019 (.60); meet with C. Hopkins regarding holdbacks (.2)	1.40	575.00	805.00
11/13/19	CBH	Continue preparation of second interim fee application (.6); review of holdbacks and meeting with M. Guitian regarding same (.5).	1.10	195.00	214.50
11/14/19	JHG	Review ECF 9144 fee application.	0.20	765.00	153.00
11/14/19	MGG	Review and revise Second Interim Fee Application. Revise background and description of role in cases (2.70), review with accounting fees paid and amounts due (1.0), review and revise summaries (1.0). review and revise exhibits (1.0), review and revise declaration in support (.40).	6.10	575.00	3,507.50
11/14/19	MGG	Review September Fee amounts, cover letter and service on Notice Parties.	0.80	575.00	460.00
11/14/19	CE	Review September invoices and draft September 2019 Fee Statement including Ex.A Certification, Ex. B Declaration and Ex C Notice to Parties; Interoffice meeting with M. Guitian; calendar objection deadline.	0.50	150.00	75.00

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11/14/19	CBH	Edit to and finalization of second interim fee application; incorporate edits from counsel (.8); attention to current fees owed for this period (.8); meeting with M. Guitian regarding same (.5).	2.10	195.00	409.50
11/15/19	JHG	Review GJB submission regarding award of fees and invoices.	1.40	765.00	1,071.00
11/15/19	JA	Prepare Interim Fee Statements	1.10	575.00	632.50
11/15/19	CE	Draft and serve the August 2019 Monthly Fee Objection Statement; calendar deadline for payment.	0.50	150.00	75.00
11/15/19	CBH	Final meeting and comments to second interim fee application (.6); review and edits to fee application (.4); final formatting (.4); final preparation and filing second interim fee application; filing of notice of hearing (.6).	2.00	195.00	390.00
11/18/19	JA	Review and analyze Trustpoint invoice (.1).	0.10	575.00	57.50
11/19/19	MGG	Email to Ken Forrest and John Arrastia re: amount of outstanding fees and holdbacks.	0.40	575.00	230.00
11/19/19	MGG	Office conference with C. Hopkins re: service of September Fee Statement and extension of objection deadline.	0.30	575.00	172.50
11/20/19	JNS	Service email for (1) Second Interim Fee Application Of Genovese Joblove And Battista, P.A. As Special Litigation Counsel To Official Committee Of Unsecured Creditors, For Services Rendered And Reimbursement Of Expenses For Period From June 1, 2019 through September 30, 2019 [ECF No. 9213]; Notice of Hearing on same [ECF No. 9214]	2.20	75.00	165.00
11/20/19	JZ	Conference with J. Sardina regarding service of GJB's second interim Fee Application and retrieve master service list for the month of November (.3); serve Fee Application via e-mail and/or mail upon all parties on the 13 page service list (.7); draft and file Certificate of Service on the same (.6)	1.60	195.00	312.00
11/21/19	CBH	Receipt and review of certificate of service on fee application and notice of hearing; meeting with J. Zamora regarding same.	0.50	195.00	97.50
11/25/19	CBH	Meeting with M. Guitian regarding monthly budgets in fee application.	0.30	195.00	58.50
11/27/19	JA	Review and prepare fee statement drafts in conformity with Fee Examiner guidelines	1.40	575.00	805.00
Subtotal: B160 / Fee/Employment Applications			53.80		\$22,429.00
B161 / Budgeting					
11/13/19	JA	Prepare budget for December.	1.00	575.00	575.00
11/15/19	JA	Analyze and prepare budget for December	1.30	575.00	747.50

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11/25/19	MGG	Email to and from John Arrastia with copies of monthly budgets submitted.	0.30	575.00	172.50
Subtotal: B161 / Budgeting			2.60		\$1,495.00
B165 / Fee-Employment Other Professionals					
11/04/19	MGG	Receipt and review email from Juan J. Casillas Ayala with copies of CST Professional Fee Statements for September 2019.	0.40	575.00	230.00
11/13/19	MGG	Review Jose Cartaya's proposed November Budget (.20). Correspondence with Mr. Cartaya re: monthly fees and budget (.30).	0.50	575.00	287.50
11/25/19	JA	Review data storage invoice and refund issues.	0.20	575.00	115.00
Subtotal: B165 / Fee-Employment Other Professionals			1.10		\$632.50
B190 / Other Contested Matters					
11/05/19	JA	Investigate facts underpinning Citi preference analysis by SCC (.6); review preference analysis (.2).	0.80	575.00	460.00
11/18/19	JZ	Conference with C. Hopkins regarding GJB Second Interim Fee Application and the service of same; calendar hearing date and objection deadline; update electronic case profile.	0.30	195.00	58.50
11/27/19	JA	Review correspondence and draft status report regarding sealed information (.2); review correspondence from mediation team (.1); review mediation team report and analyze same (1.6); confer with Paul Hastings regarding Mediator's Interim Report (.3).	2.20	575.00	1,265.00
Subtotal: B190 / Other Contested Matters			3.30		\$1,783.50
B191 / General Litigation					
11/01/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
11/01/19	JHG	Review and analyze urgent motion to file under seal ECF 9070.	0.60	765.00	459.00
11/01/19	JHG	Review UCC motion objection to PREPA/AAFAF settlement and RSA.	3.60	765.00	2,754.00
11/01/19	JHG	Review declaration of Scott Martinez in support of ECF 9070 and supporting exhibit.	2.20	765.00	1,683.00
11/01/19	JA	Review proposed Amended Clawback Complaint (.5); review Notices of third-party subpoenas from Hine firm (.4); review Court Order in Walmart Adv. (.1); review Order of Reference to Magistrate Judge re: Walmart (.1).	1.10	575.00	632.50
11/01/19	JMS	Prepare comprehensive litigation summary	2.80	500.00	1,400.00

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11/01/19	IRS	Finalize draft answers to ERS adversary counterclaims. (2.3)	3.90	350.00	1,365.00
		Review and prepare extensive correspondence to all co-plaintiffs' counsel regarding review and request for comments on draft answers (1.2)			
		Strategize with co-plaintiffs' counsel regarding ERS claims history (.4)			
11/01/19	IRS	Receipt and review court order permitting Walmart's response to motion to dismiss and referring motion to Magistrate for R&R. (.4)	1.20	350.00	420.00
		Review correspondence regarding hearing procedures and protocol. (.2)			
		Review case management procedures regarding hearings and prepare correspondence regarding same. (.6)			
11/01/19	IRS	Strategize regarding pending deliverables in adversary cases and scope of work going forward.	0.40	350.00	140.00
11/01/19	JPB	Review and analyze underwriters' presentations and advice to GDB prior to 2011 PRBA bond issuances in anticipation of amending factual allegations of the Complaint (19-00280).	4.40	375.00	1,650.00
11/01/19	JPB	Review and analyze underwriters' presentations and advice to GDB prior to 2011 GO bond issuance in anticipation of amending factual allegations of the Complaint (19-00280).	2.60	375.00	975.00
11/01/19	JZ	Attention to text order in Walmart adversary case regarding Walmart's Motion to leave; attention to e-mails regarding sur-reply and future discovery.	0.30	195.00	58.50
11/01/19	JZ	Receipt and review of Walmart's Reply to UCC's Response to Motion to Dismiss; receipt of Order referring case to Magistrate; circulate same; update electronic case profile.	0.40	195.00	78.00
11/01/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
11/01/19	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS1 Tranche 41 (24 documents)	1.10	195.00	214.50
11/02/19	MGG	Receipt and review email from Tristan Axelrod with copy of Third Notice of Voluntary Dismissal re: various Defendants.	0.20	575.00	115.00
11/02/19	MGG	Review email from Tristan Axelrod, Esq with copies of Amended Challenged GO and PBA Bonds re: Defendant 1B; Second Amended Complaint to Avoid and Recover Fraudulent Transfers re: Defendant 1A; Amended Adversary Complaint re: Defendant 1D; and Urgent Motion for Leave of Court to File Amended Adversary Complaint and update information.	0.50	575.00	287.50
11/02/19	SS	Rcview and analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 42 (125 documents)	2.60	195.00	507.00
11/03/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 39 (42 Documents).	3.40	465.00	1,581.00

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11/04/19	JHG	Review S. Siff daily summaries to identify and analyze strategic litigation issues.	0.60	765.00	459.00
11/04/19	JHG	Review urgent motion to seal objection ECF 9073.	0.50	765.00	382.50
11/04/19	JHG	Review ECF 9077 order setting deadline.	0.20	765.00	153.00
11/04/19	JHG	Review email and consider issues regarding Zwillinger affidavit.	1.80	765.00	1,377.00
11/04/19	JHG	Review ECF 9083, order to show cause.	0.20	765.00	153.00
11/04/19	JHG	Review email from Brian Hine and attached witness subpoena.	1.00	765.00	765.00
11/04/19	JHG	Review ECF 1713 urgent joint motion for seventh revised order and deadlines contained in order.	1.10	765.00	841.50
11/04/19	JA	Attention to various adversaries, discovery and motion practice (.4); confer with local counsel regarding proposed filings in AP 288 (.1); attention to researching record of transactions relating to Citi avoidance action (.4); review translated exhibits (.2); review Rule 26 disclosures from BNYM (.1) in AP 366; review ERS discovery requests (.6).	1.80	575.00	1,035.00
11/04/19	IRS	Review correspondence regarding case management and incoming discovery requests in the ERS Adv. Cases. (.2)	0.20	350.00	70.00
11/04/19	JPB	Review and analyze underwriters' presentations and advice to GDB prior to 2012 bond issuances in anticipation of amending factual allegations of the Complaint (19-00280).	4.30	375.00	1,612.50
11/04/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 1 (17 documents).	2.80	375.00	1,050.00
11/04/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 40 (54 Documents).	2.70	465.00	1,255.50
11/04/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 41 (28 Documents).	1.80	465.00	837.00
11/04/19	JZ	Receipt and review of Walmart's certified translations of the exhibits on their Motion to Dismiss Adversary; circulate same; update electronic case profile.	0.30	195.00	58.50
11/04/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.20	195.00	39.00
11/04/19	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 43 (40 documents)	1.00	195.00	195.00
11/05/19	JHG	Review daily summaries prepared by S. Siff to identify and analyze strategic litigation issues.	1.60	765.00	1,224.00
11/05/19	JHG	Review ECF 9095 regarding extent of modification of automatic stay.	0.20	765.00	153.00

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11/05/19	JHG	Review PREPA ECF 1719, fifth joint informative motion regarding scheduling deposition of Morales and Torres.	0.40	765.00	306.00
11/05/19	JHG	Review Walmart complaint and pleadings (1.3); analysis of proposed resolution (.6)	1.90	765.00	1,453.50
11/05/19	JHG	Review ECF 9096, response of individual bondholder.	0.30	765.00	229.50
11/05/19	JHG	Review ECF 9097 stipulation regarding automatic stay.	0.20	765.00	153.00
11/05/19	JA	Confer with local counsel regarding Walmart case strategy (.1)	0.10	575.00	57.50
11/05/19	JMS	Work on amended complaint against underwriters, focus on swap termination payments.	3.40	500.00	1,700.00
11/05/19	MGG	Review Doc No. 9105 re: filing of updated pseudonym key are being used (Doc No. 9105)	0.20	575.00	115.00
11/05/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1275 - 1332) (2.7)	4.70	565.00	2,655.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 13334 - 1412) (2.0)			
11/05/19	AMC	Research concerning extension of automatic stay pursuant to s. 362	1.60	375.00	600.00
11/05/19	IRS	Review Walmart's translated exhibits filed 11/4/19.	0.30	350.00	105.00
11/05/19	IRS	Review docket entry updates from S. Siff.	0.30	350.00	105.00
11/05/19	IRS	Review Magistrate Judge Dien's standing case management order regarding motions and referrals.	0.40	350.00	140.00
11/05/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 2 (10 documents).	2.20	375.00	825.00
11/05/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 42 (46 Documents).	3.20	465.00	1,488.00
11/05/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/05/19	SS	Review and Analyze database of documents produced by Kobre and Kim. Batch SS1, Tranche 44 (40 documents)	1.00	195.00	195.00
11/06/19	JHG	Review email from S. Siff attaching ECF 9112, motion for extension of time.	0.30	765.00	229.50
11/06/19	JHG	Review additional S. Siff summary to identify and analyze strategic litigation issues.	0.30	765.00	229.50
11/06/19	JHG	Review ECF 17, in 19-00288, urgent motion to amend to add individual bondholders and review original complaint.	1.00	765.00	765.00

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11/06/19	JHG	Review draft of amended adversary complaint.	1.90	765.00	1,453.50
11/06/19	JA	Investigate facts underlying Citi request for settlement.	0.40	575.00	230.00
11/06/19	JMS	Work on strategy and research relating to parallel monoline litigation and review injunction issues.	3.80	500.00	1,900.00
11/06/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1413 - 1433) (2.0)	3.00	565.00	1,695.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1434 - 1454) (1.0)			
11/06/19	AMC	Research concerning standards for mandatory and permissive intervention under Rule 24(a) and Rule 24(b).	2.40	375.00	900.00
11/06/19	IRS	Review correspondence from SCC Counsel regarding upcoming ERS filings. (.3)	0.60	350.00	210.00
		Prepare correspondence to GJB team regarding SCC counsel's compliance with court orders. (.3)			
11/06/19	IRS	Prepare internal memorandum regarding responsibilities pursuant to Walmart's Rule 11 letter and status of claims. (4)	4.40	350.00	1,540.00
		Prepare correspondence to local counsel regarding claims status and review local counsel's comments regarding filed response in opposition to Walmart's motion to dismiss. (.4)			
11/06/19	IRS	Review daily docket entry updates from S. Siff.	0.30	350.00	105.00
11/06/19	IRS	Review discovery procedures applicable to Adversary Proceedings and coordinate Rule 26 conference with SCC and Walmart.	0.40	350.00	140.00
11/06/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 3 (38 documents).	3.90	375.00	1,462.50
11/06/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 43 (33 Documents).	3.20	465.00	1,488.00
11/06/19	JZ	Receipt and review of Motion for Leave to File Amended Complaint and the Amended Complaint with voluminous exhibits in ADV 19-00288 (1-D); download exhibits; circulate same; update electronic case profile.	0.50	195.00	97.50
11/06/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/06/19	JZ	Retrieve case law for A. Castaldi's review.	0.40	195.00	78.00
11/06/19	SS	Review and Analyze database of documents produced by Kobre and Kim, Batch SS1, Tranche 45 (60 documents)	1.90	195.00	370.50

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11/07/19	JHG	Review email from Alex Bongartz and analyze issues regarding effect of testimony on RSA.	0.80	765.00	612.00
11/07/19	JHG	Review and analyze ECF 9120 regarding Jose Ortiz deposition, memorandum order.	1.00	765.00	765.00
11/07/19	JHG	Review and analysis of draft motion in limine.	1.80	765.00	1,377.00
11/07/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
11/07/19	JHG	Review ECF 45, 47 and 19 order on motion to file fourth amended complaint.	0.50	765.00	382.50
11/07/19	JA	Receive and review memorandum regarding letter concerning Rule 11 from defendant Walmart (.6); review email correspondence from mediation team (.1); review correspondence regarding claims analysis (.1)	0.80	575.00	460.00
11/07/19	JMS	Detailed review of Rule 11 issues raised by Walmart (1.9); work on amended underwriter complaint (1.7)	3.60	500.00	1,800.00
11/07/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1454 - 1475) (1.6).	4.10	565.00	2,316.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1476 - 1506) (1.2).			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1507-1527) (1.3).			
11/07/19	AMC	Analyze existing issues regarding pending adversary proceedings adverse to Walmart, underwriters, and challenged-bond holders.	0.60	375.00	225.00
11/07/19	AMC	Research concerning procedural elements of intervention under Rule 24.	0.60	375.00	225.00
11/07/19	AMC	Research of First Circuit and other federal authorities relating to distinction between derivative and creditor-specific claims.	1.10	375.00	412.50
11/07/19	IRS	Prepare internal memorandum regarding Walmart ADV claims and Rule 11 letter.	3.20	350.00	1,120.00
11/07/19	IRS	Review correspondence regarding service of translated second stay order through prime clerk for Adv. 19-297, 364 and coordinate service with paralegal staff.	0.60	350.00	210.00
11/07/19	IRS	Strategize regarding pending matters, provide status update as to the ERS litigation and service issues, and review possible strategy for intervention in relevant third party actions.	1.20	350.00	420.00
11/07/19	IRS	Call with SCC Counsel regarding discovery procedures and cooperation between UCC and SCC in upcoming Adv. case discovery matters.	0.50	350.00	175.00

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11/07/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 4 (25 documents).	3.40	375.00	1,275.00
11/07/19	JZ	Receipt and review of Motion for Leave to File Amended Complaint and the Amended Complaint with voluminous exhibits in ADV 19-00283 (Hilliard Lyons); download exhibits; circulate same; update electronic case profile.	0.50	195.00	97.50
11/07/19	JZ	Receipt and review of Motion for Leave to File Amended Complaint and the Amended Complaint with voluminous exhibits in ADV 19-00357; download exhibits; circulate same; update electronic case profile.	0.40	195.00	78.00
11/07/19	JZ	Receipt and review of Order Granting Urgent motion For Leave of Court to File Amended Adversary Complaint in ADV. 19-00283, 19-00357, 19-00288; circulate same; update electronic case profile.	0.30	195.00	58.50
11/07/19	JZ	Attention to Walmart's Rule 9011 letter and assist in the internal memorandum of same.	0.40	195.00	78.00
11/07/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.20	195.00	39.00
11/07/19	SS	Review and Analyze database of documents produced by Kobre and Kim, Baqtch SS1, Tranche 46 (34 documents)	1.30	195.00	253.50
11/08/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
11/08/19	JHG	Review ECF 9124 order on motion to extend.	0.20	765.00	153.00
11/08/19	JHG	Review ECF 9126 urgent motion to file list of third party claims under seal.	0.60	765.00	459.00
11/08/19	JHG	Review ECF 9122 order to file under seal.	0.20	765.00	153.00
11/08/19	JHG	Review and analyze email from Alex Bongartz outlining \$320 million claims and judgments (1.1); research additional issues (.3)	1.40	765.00	1,071.00
11/08/19	JA	Research facts underlying Walmart transaction with Commonwealth (1.6); receive email correspondence from mediation team (.1); review correspondence regarding unsecured claims analysis (.3); review Order on Motion to Seal on Temporary Basis (.1)	2.10	575.00	1,207.50
11/08/19	MAF	[Monoline] Conference with A Castaldi regarding issues related to potential intervener complaint; consider issues, provide thoughts to Castaldi for further evaluation and review (0.3);	0.30	550.00	165.00
11/08/19	MGG	Review and monitor Doc No. 9126, 9128 9105 and 6493 re: SCC's Motion seeking the entry of an order authorizing the filing of the confidential list of third party claims under seal.	0.60	575.00	345.00
11/08/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1530 - 1583).	2.50	565.00	1,412.50

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11/08/19	IRS	Conduct legal analysis regarding process and procedure for Rule 24 intervention.	0.60	350.00	210.00
11/08/19	IRS	Review docket entry updates relating to adversary proceedings and sealed filings.	0.40	350.00	140.00
11/08/19	AMC	Completed review and analysis of certified translation of complaint removed to PROMESA proceedings filed by monoline insurers against underwriters and other related parties, and documents related to said removal	5.70	375.00	2,137.50
11/08/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 5 (25 documents).	2.60	375.00	975.00
11/08/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/08/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 47 (70 documents)	1.50	195.00	292.50
11/11/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues, review ECF 9129, order granting motion to seal.	0.30	765.00	229.50
11/11/19	JHG	Review ECF 9130 informative motion regarding automatic stay and related order.	0.20	765.00	153.00
11/11/19	JHG	Review FOMB urgent motion to strike, ECF 9131, regarding 2004 discovery.	0.70	765.00	535.50
11/11/19	JHG	Review ECF 1767 PREPA regarding scheduling of briefing.	0.40	765.00	306.00
11/11/19	JHG	Review and analysis of email from Luc Despins regarding results of mediation.	1.60	765.00	1,224.00
11/11/19	JA	Receive and review additional ERS Notices of Dismissal and updated Appendices.	0.20	575.00	115.00
11/11/19	JA	Strategize with Jesus Suarez regarding Walmart (.3); review correspondence regarding discovery in Adversary Proceedings (.3)	0.60	575.00	345.00
11/11/19	JMS	Confer with J. Arrastia regarding Walmart.	0.30	500.00	150.00
11/11/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1584 - 1670) (1.5)	3.40	565.00	1,921.00
11/11/19	AMC	Review of master DTC data completion (1.0) and telephone call with T. Axelrod in conjunction of communication with opposing counsel (.2)	1.20	375.00	450.00

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11/11/19	IRS	Review correspondence from Co-Plaintiffs counsel regarding the ERS Clawback litigations. (.4)	3.40	350.00	1,190.00
		Review draft dismissals and informative motions relating to the ERS Clawback actions. (1.2)			
		Prepare correspondence regarding GJB position on proposed draft filings. (.2)			
		Review procedure and discovery orders applicable to the ERS Clawback actions. (1.6)			
11/11/19	IRS	Prepare draft requests for production to Walmart Puerto Rico regarding the claims in the ADV complaint.	2.50	350.00	875.00
11/11/19	IRS	Review docket entry updates from S. Siff.	0.30	350.00	105.00
11/11/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 6 (29 documents).	3.50	375.00	1,312.50
11/11/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/11/19	SS	Review and Analyze database of Kobre and Kim documents, Batch SS1, Tranche 48 (46 documents)	1.40	195.00	273.00
11/12/19	JHG	PREPA review and analyze email from J. Arrastia to committee.	0.80	765.00	612.00
11/12/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.20	765.00	153.00
11/12/19	JHG	Review ECF 9135 regarding 2004 motion.	0.30	765.00	229.50
11/12/19	JA	Email correspondence to Walmart counsel (.1); prepare, revise and finalize memorandum regarding Rule 11 demand from Walmart (2.2); strategize with Jesus Suarez regarding Citi request for settlement (.3).	2.60	575.00	1,495.00
11/12/19	JMS	Continued factual development concerning claims against Wal-Mart and viability of alternate theories of recover (1.7); review issues relating to Citi swap termination payments (1.8)	3.50	500.00	1,750.00
11/12/19	JA	Prepare strategy email memoranda regarding Citi request for settlement.	0.70	575.00	402.50
11/12/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1671 - 1725) (3.0).	5.50	565.00	3,107.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1726 - 1736) (.5).			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1737 - 1792) (2.0).			

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11/12/19	AMC	Preparation of draft Motion to Intervene in Monoline adversary proceeding.	5.80	375.00	2,175.00
11/12/19	AMC	Review and analyze memorandum concerning Rule 11 letter served by counsel for Walmart in Adv. 19-267.	0.60	375.00	225.00
11/12/19	IRS	Extensive review and catalogue of all filed adversary proceedings pleadings and case management orders.	2.50	350.00	875.00
11/12/19	IRS	Confer regarding analysis and research on Rule 11 sanctions.	0.20	350.00	70.00
11/12/19	IRS	Revise confidential memo regarding legal research and analysis of Walmart's claims and Rule 11 letter. (1.6)	2.20	350.00	770.00
		Conduct legal research and analysis regarding Rule 11 notice requirements under First Circuit law. (.6)			
11/12/19	IRS	Conduct legal research and analysis regarding escrowed funds held by debtor at time of filing bankruptcy petition.	0.70	350.00	245.00
11/12/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 6 (11 documents).	3.40	375.00	1,275.00
11/12/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 7 (23 documents).	2.90	375.00	1,087.50
11/12/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 8 (7 documents).	3.00	375.00	1,125.00
11/12/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.20	195.00	39.00
11/12/19	SS	Review and Analyze database documents from Kobre and Kim Batch SS1, Tranche 49 (35 documents)	1.10	195.00	214.50
11/13/19	JHG	Review email from J. Arrastia regarding strategy.	0.30	765.00	229.50
11/13/19	JHG	Review Walmart adversary complaint attached to email and re-analyze transfer issues.	2.20	765.00	1,683.00
11/13/19	JHG	Review analysis and strategic evaluation of confidential memorandum regarding Rule 11 complaint and basis of well-grounded allegation.	0.80	765.00	612.00
11/13/19	JHG	Review email from Alvin Velazquez regarding opposition to stay and consider issues.	0.40	765.00	306.00
11/13/19	JA	Review opposition to Motion for Remand (1.8); and strategize regarding issues as related to UCC (1.5).	3.30	575.00	1,897.50
11/13/19	JMS	Attention to tax issues concerning Wal-Mart settlement (.6); and attention to requests for information concerning lien avoidance claims from sealed defendants (1.3)	1.90	500.00	950.00
11/13/19	MAF	[Walmart] Conference with J. Arrastia regarding issues related to alleged defense of avoidance claim.	0.30	550.00	165.00
11/13/19	JA	Strategize with Mike Friedman regdring Walmart Avoidance Action.	0.30	575.00	172.50

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11/13/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1793 - 1825) (1.5).	5.50	565.00	3,107.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1826 - 1880) (1.5).			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 881 - 1996) (2.5).			
11/13/19	AMC	Review and analyze claims / factual predicates therefor in draft amended complaint for filing in 19-280.	0.70	375.00	262.50
11/13/19	IRS	Follow up regarding Magistrate Judge Dein's procedures to set referred motions for hearing.	0.20	350.00	70.00
11/13/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 9 (20 documents).	3.70	375.00	1,387.50
11/13/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 10 (9 documents).	3.20	375.00	1,200.00
11/13/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5A, Tranche 11 (6 documents).	2.30	375.00	862.50
11/13/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/13/19	JZ	Receipt and review of Motion Submitting Corrected Appendix in ADV 19-00283; update electronic case profile.	0.20	195.00	39.00
11/13/19	JZ	Receipt and review of Notice of Voluntary Dismissal in ADV 19-00283; update electronic case profile.	0.20	195.00	39.00
11/13/19	JZ	Receipt and review of Motion Submitting Corrected Appendix in ADV 19-00288; update electronic case profile.	0.20	195.00	39.00
11/13/19	JZ	Receipt and review of Motion Submitting Corrected Appendix in ADV 19-00357; update electronic case profile.	0.20	195.00	39.00
11/13/19	JZ	Receipt and review of Notice of Voluntary Dismissal in ADV 19-00357; update electronic case profile.	0.20	195.00	39.00
11/13/19	JZ	Receipt and review of Notice of Voluntary Dismissal in ADV 19-00356; update electronic case profile.	0.20	195.00	39.00
11/13/19	JZ	Receipt and review of Notice of Voluntary Dismissal in ADV 19-00359; update electronic case profile.	0.20	195.00	39.00
11/13/19	SS	Review and analyze database of documents produced by Kobre and Kim, Batch SS1, Tranch 50 (68 documents)	1.30	195.00	253.50
11/14/19	JHG	Review daily summary provided by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
11/14/19	JHG	Review ECF 9147, Magistrate order setting briefing schedule on ECF 9022.	0.20	765.00	153.00

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11/14/19	JHG	Continued review of "hot docs" in Walmart litigation.	2.80	765.00	2,142.00
11/14/19	JHG	Review November 14, 2019 S. Siff daily summary to identify and analyze strategic litigation issues.	0.70	765.00	535.50
11/14/19	JHG	Review ECF 9151 regarding Amici Curiae motion.	0.20	765.00	153.00
11/14/19	JHG	Review ECF 9154 order requiring supplemental briefing as relating to RSA.	0.80	765.00	612.00
11/14/19	JHG	Review ECF 9155, proposed revised order.	0.20	765.00	153.00
11/14/19	JHG	Review ECF 1733 regarding Amici Curiae brief.	0.20	765.00	153.00
11/14/19	JHG	Review email from Alex Bongartz and consideration of mediation issues and related emails..	0.80	765.00	612.00
11/14/19	JHG	Review email from J. Arrastia (.3) and extensive analysis of ECF 1737, notices of removal and exhibits (3.1)	3.40	765.00	2,601.00
11/14/19	JA	Attention to settlement materials relating to swap termination fees as an additional element of damages (.6); Strategize with Jesus Suarez regarding response to request for settlement demand (.3); confer with J. Genovese regarding removal issues (.3)	1.20	575.00	690.00
11/14/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 1991 - 2045) (3.0). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 2046 -2119) (2.1).	5.10	565.00	2,881.50
11/14/19	JPB	Review and analyze underwriters' presentations and advice to GDB regarding PREPA securitization in anticipation of amending factual allegations of the Complaint (19-00280).	4.40	375.00	1,650.00
11/14/19	JPB	Review and analyze underwriters' presentations and advice to GDB regarding use of special purpose vehicles in anticipation of amending factual allegations of the Complaint (19-00280).	4.20	375.00	1,575.00
11/14/19	JPB	Review and analyze claims against Citi related to swap fee terminations as alleged in proposed Amended Complaint (19-00280).	1.10	375.00	412.50
11/14/19	IRS	Review docket entry updates from S. Siff.	0.20	350.00	70.00
11/14/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/14/19	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS1, Tranch 51 (73 documents)	1.30	195.00	253.50

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11/15/19	JHG	Review article forwarded by Alex Bongartz regarding PREPA RSA.	0.50	765.00	382.50
11/15/19	JHG	Review daily summary prepared by S. Siff attaching various fee applications and other pleadings (not reviewed) to identify and analyze strategic litigation issues.	0.70	765.00	535.50
11/15/19	JHG	Review ECF 9186, Duff & Phelps statement of material facts and related filings.	0.90	765.00	688.50
11/15/19	JHG	Review ECF 20 in 19-00267 regarding certification of translations.	0.30	765.00	229.50
11/15/19	JA	Multiple email correspondence with counsel for Walmart (.4) and review materials provided by Walmart (.3); review court order regarding translations (.1).	0.80	575.00	460.00
11/15/19	JA	Reveiw draft amended procedures order	0.10	575.00	57.50
11/15/19	JA	Reveiw order regarding translated documents for Wal-Mart Adv.	0.10	575.00	57.50
11/15/19	JA	Review Reply re Motion in Limine precluding the Office Committee of UNsecured Creditors from Entering Expert Report	0.30	575.00	172.50
11/15/19	MAF	(Walmart) conference call with J Suarez to discuss legal issues in the case, defenses, strategy, next steps (0.5).	0.60	550.00	330.00
11/15/19	JMS	Confer and strategize with M. Friedman regarding Walmart Avoidance Action.	0.60	500.00	300.00
11/15/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 2021 - 2150) (1.5).	4.80	565.00	2,712.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 2151 2250) (3.3).			
11/15/19	JA	Review and analysis of summary of Monoline removal issues and claims and case strategy.	2.30	575.00	1,322.50
11/15/19	JPB	Review and analyze underwriters' presentations and advice to GDB financing proposals for PREPA issuances (19-00280).	3.30	375.00	1,237.50
11/15/19	JPB	Review and analyze underwriters' presentations related to asset manager functions (19-00280).	1.40	375.00	525.00
11/15/19	JPB	Review and analyze underwriters'closed end fund holdings 2013-2014 (19-00280).	4.00	375.00	1,500.00

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11/15/19	IRS	Analyze draft motion to modify case management procedures for adversary cases and draft proposed order. (1.5)	2.70	350.00	945.00
		Prepare correspondence with recommendation as to GJB position on the motion to modify case management procedures. (.4)			
		Confer and strategize with J. Zamora regarding translations in Walkart Adversary (.2)			
		Review correspondence regarding adversary defendants' participation in informal discovery and recommending dismissal of limited actions. (.6)			
11/15/19	IRS	Review Judge Dein's Order requiring certified translations of cases and statutes cited in response in opposition to Walmart's Motion to Dismiss. (.3)	1.50	350.00	525.00
		Review and respond to correspondence regarding requirements in the order. (.4)			
		Prepare documents for translation per magistrate's order. (.8)			
11/15/19	IRS	Review docket entry updates from S. Siff.	0.20	350.00	70.00
11/15/19	JZ	Receipt and review of the Order requiring certified translations of cases cited with regard to the Motion to Dismiss in the Walmart Adversary matter; conference with I. Sadovnic regarding same; retrieve case law.	0.40	195.00	78.00
11/15/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.30	195.00	58.50
11/15/19	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS1, Ttranche 52 (133 documents)	1.50	195.00	292.50
11/16/19	SS	Continued review and analysis of database documents produced by Kobre and Kim, Batch SS1, Tranche 53 (52 documents)	2.00	195.00	390.00
11/17/19	JA	Confer and strategize with Jesus Suarez regarding Underwriter complaint strategy and impact of Monoline removal of claims against underwriters	0.60	575.00	345.00
11/17/19	JMS	Strategize with J. Arrastia regarding revised underwriter Complaint.	0.60	500.00	300.00
11/18/19	JHG	Review and analysis of ECF 1744 urgent motion in limine precluding UCC from offering expert report.	1.50	765.00	1,147.50
11/18/19	JHG	Review email from Alex Bongartz regarding committee meeting relating to litigation issues including motion to dismiss PREPA Fuel Oil complaint and RSA issues.	3.60	765.00	2,754.00
11/18/19	JHG	Review attached removal petition regarding VITOL in PREPA.	0.40	765.00	306.00

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11/18/19	JHG	Review and analyze ECF 49 in 19-00396, motion to intervene.	1.30	765.00	994.50
11/18/19	JA	Attention to court order regarding translations in Walmart Adv. (.1); analyze Paulian claim issues (.4); review Opposition to Motion for Removal by Monolines as defendants in financial target litigation (1.4).	1.90	575.00	1,092.50
11/18/19	JMS	Continued review of plan of adjusiment concerning impact on litigation claims vis underwriters (1.9); continued attention to committee action on Wal-Mart and other litigation (2)	3.90	500.00	1,950.00
11/18/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 2251 - 2274) (1.5).	5.50	565.00	3,107.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 2275 - 2407) (4.0).			
11/18/19	IRS	Prepare correspondence regarding order requesting certified translations of cases and statutes cited in Walmart Response to MTD. (.3)	0.60	350.00	210.00
		Review and submit translation quote for approval. (.3)			
11/18/19	IRS	Prepare correspondence to co-plaintiff's counsel regarding GJB approval of draft motion to extend deadlines applicable to Adv. and Vender avoidance actions.(.3)	0.90	350.00	315.00
		Review corrected motion to extend deadlines and correspondence regarding confirmation of filing. (.6)			
11/18/19	AMC	Continue drafting Motion to Intervene regarding ongoing litigation brought by Monoline insurers.	5.40	375.00	2,025.00
11/18/19	AMC	Began review of amended complaint for filing in 19-280.	1.20	375.00	450.00
11/18/19	AMC	Review, analyze and comment on addendum to tolling agreements.	0.60	375.00	225.00
11/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 20 (21 documents).	3.40	375.00	1,275.00
11/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 21 (14 documents).	3.10	375.00	1,162.50
11/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 22 (9 documents).	2.20	375.00	825.00
11/18/19	JZ	Receipt and review of internal report circulated by S. Siff and calendar appropriate deadlines.	0.20	195.00	39.00
11/18/19	JZ	Receipt and review of Objection to Plan of Adjustment filed by creditor PFZ Properties, Inc; attention to e-mail from S. Siff regarding same.	0.30	195.00	58.50

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11/18/19	JZ	Numerous internal conferences regarding obtaining spanish language translations cited in the Walmart response; conferences with different translation companies to obtain quickest turn around time; coordinate service of same.	0.90	195.00	175.50
11/18/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 54 (39 documents)	1.20	195.00	234.00
11/19/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00
11/19/19	JHG	Review and analyze issues related to urgent motion to seal.	0.50	765.00	382.50
11/19/19	JHG	Review order on motion to seal, ECF 1748.	0.40	765.00	306.00
11/19/19	JHG	Review emails regarding timing of payment on fee applications.	0.30	765.00	229.50
11/19/19	JHG	Review additional S. Siff daily memorandum to identify and analyze strategic litigation issues.	0.30	765.00	229.50
11/19/19	JHG	Review UCC ECF 9251 regarding sealing LEI report.	0.70	765.00	535.50
11/19/19	JHG	Analyze issues regarding response to RFP by Sculptor Capital.	0.40	765.00	306.00
11/19/19	JHG	Review email from Alex Bongartz and attached objection to confirmation ECF 9223.	0.70	765.00	535.50
11/19/19	JA	Analyze Citi Preference Settlement Request and additional issues (.6); confer and strategize with Jesus Suarez (.4).	1.00	575.00	575.00
11/19/19	JA	Review all pending legal issues and analyze same for Committee consideration.	0.80	575.00	460.00
11/19/19	JMS	Continued analysis of Citi claims (1.4); review issues relating to amended underwriter complaint (1.6); and review of Wal-mart dismissal options (1.8); confer and strategize with J. Arrastia regarding Citi (.4)	5.10	500.00	2,550.00
11/19/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 4 (Docs 2407 - 2500) (3.0).	4.00	565.00	2,260.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1 - 16) (1.0).			
11/19/19	IRS	Confer regarding Paulian Transfers and available case law under Puerto Rico law.	0.60	350.00	210.00
11/19/19	IRS	Review docket entry updates from S. Siff.	0.30	350.00	105.00
11/19/19	AMC	Draft Rule 24 (c) Intervention Complaint.	3.90	375.00	1,462.50

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11/19/19	AMC	Research/review of jurisdictional aspects of Promesa as applied to adversary proceedings, and review of Rule 7001 for purposes of confirming propriety of putative contested matter as adversary proceeding.	0.60	375.00	225.00
11/19/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 23 (19 documents).	4.00	375.00	1,500.00
11/19/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 24A (11 documents).	3.30	375.00	1,237.50
11/19/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
11/19/19	JZ	Receipt and review of the SSC and UCC's Omnibus Motion to Extend Deadlines in the Procedures Order [ECf No. 9254]; and the Notice of Hearing on the same; calendar hearing date and objection deadline; update electronic case profile.	0.30	195.00	58.50
11/19/19	JZ	Receipt and review of Motion in Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation; receipt of Notice of Hearing on same; calendar hearing date and objection deadlines; update electronic case profile.	0.30	195.00	58.50
11/19/19	JZ	Review and index catalogue on past production received and calendar appropriate deadlines.	0.50	195.00	97.50
11/19/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 55, (102 documents)	1.70	195.00	331.50
11/20/19	JHG	Review email from Alex Bongartz regarding UCC supplemental objection.	0.40	765.00	306.00
11/20/19	JHG	Review PREPA supplemental brief draft regarding objection to proof of claim filed by U.S. Bank.	1.10	765.00	841.50
11/20/19	JHG	Review and analysis of email from J. Arrastia (1.4) and conference with J. Arrastia regarding same and regarding various litigation issues (.9)	2.30	765.00	1,759.50
11/20/19	JHG	Review PREPA motion to seal and analyze issues.	0.40	765.00	306.00
11/20/19	JHG	Continued review of documents pertaining to Fuel Oil payments and claims.	2.70	765.00	2,065.50
11/20/19	JA	Analyze claims against Citi and case strategy.	0.80	575.00	460.00
11/20/19	JA	Prepare comprehensive litigation strategy memorandum (1.2) and strategize with J. Genovese (.9)	2.10	575.00	1,207.50
11/20/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 16 - 67) (2.0).	3.00	565.00	1,695.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 68 - 91) (1.0).			

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11/20/19	IRS	Strategize regarding Committee conference call to discuss Walmart claims and discuss legal research and analysis from local counsel.	0.40	350.00	140.00
11/20/19	IRS	Review docket entry update from S. Siff.	0.20	350.00	70.00
11/20/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 24B (14 documents).	3.80	375.00	1,425.00
11/20/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 25 (37 documents).	3.80	375.00	1,425.00
11/20/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.40	195.00	78.00
11/20/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 56 (54 documents)	1.00	195.00	195.00
11/21/19	JHG	Review and analysis of email from Luc Despins regarding order to exclude expert witness and review order and determine impact on 9019.	2.40	765.00	1,836.00
11/21/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
11/21/19	JHG	Review opposition to Amicus Curiae motion.	0.40	765.00	306.00
11/21/19	JHG	Review and analyze email from Alex Bongartz regarding ERS claim.	0.70	765.00	535.50
11/21/19	JHG	Review ECF 9260, motion to appoint trustee, review ECF 9258, motion in limine.	0.20	765.00	153.00
11/21/19	JA	Confer with local counsel (.4); analyze Walmart claims, legal issues, and facts (.8).	1.20	575.00	690.00
11/21/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 90 - 115) (3.5).	6.70	565.00	3,785.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 146 - 200) (3.2).			

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11/21/19	IRS	Prepare correspondence to local counsel regarding Puerto Rico fraudulent transfer law and scheduling conference call to discuss same. (.2) Follow up with paralegal staff regarding certified translations to comply with Court Order in Walmart Adv. (.3) Review certified translations of Spanish case law and prepare for filing in compliance with magistrate judge's order in the Walmart Adv and prepare notice of filing. (.8) Call local counsel to discuss legal research and analysis of Paulian transfers under Puerto Rico law. (.3) Strategize regarding client communications and recommendation on adversary claims. (.5) Review notice and exhibits filed by Walmart in compliance with Court Order and prepare correspondence regarding notice of filing and compliance with court order. (.6)	2.70	350.00	945.00
11/21/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 26 (23 documents).	3.50	375.00	1,312.50
11/21/19	JZ	Receipt and review of Defendant, Walmarks certified translations of case law; circulate same; update electronic case profile.	0.30	195.00	58.50
11/21/19	JZ	Attention to the Order in Limine Precluding the Official Committee of Unsecured Creditors from Entering Expert Report into Evidence at the 9019 Motion Hearing in the PREPA case; update electronic case profile; review of e-mail from S. Siff regarding same.	0.20	195.00	39.00
11/21/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
11/21/19	JZ	Receipt and review of certified translations of Spanish case law compliance with magistrate judge's order in the Walmart Adv. (.3); e-mail same to I. Sadovnic and conference regarding preparation of Notice of Filing (.1); draft Notice of Filing and e-mail same to I. Sadovnic for review (.2)	0.60	195.00	117.00
11/21/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 57 (32 documents)	0.40	195.00	78.00
11/22/19	JHG	Review S. Siff daily summary to identify and analyze strategic litigation issues.	0.20	765.00	153.00
11/22/19	JHG	Review and analysis of ECF 43 in 19-0388 of Marrero plaintiff's motion to intervene in PREPA Fuel Oil complaint.	3.20	765.00	2,448.00
11/22/19	JHG	Review ECF 9280, order granting urgent motion in limine regarding 9019 expert report.	0.40	765.00	306.00
11/22/19	JHG	Review email from Monika Barrios and ECF 17-3283 and 17-3566 regarding administrative expenses claims.	0.80	765.00	612.00

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11/22/19	JMS	Attention to Swap Transaction involving Citi and proposed Citi settlement (1.7) and call with Scott Martinez and followup concerning OCB analysis (.9)	2.60	500.00	1,300.00
11/22/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 201 - 250) (3.0).	6.50	565.00	3,672.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 251 - 400) (3.5).			
11/22/19	IRS	Review final notice of filing and translated exhibits in compliance with Court's order in Walmart Adv and confirm documents for filing.	0.30	350.00	105.00
11/22/19	IRS	Review docket entry updates from S. Siff and submit deadlines to paralegal staff for calendaring.	0.40	350.00	140.00
11/22/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 27 (17 documents).	2.60	375.00	975.00
11/22/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 44 (40 Documents).	3.40	465.00	1,581.00
11/22/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 45 (5 Documents).	1.80	465.00	837.00
11/22/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
11/22/19	JZ	Revise Notice of Filing to include the English-version of the cited statutes in the Walmart adversary; finalize Notice of Filing with exhibits and file same; update electronic case file.	0.60	195.00	117.00
11/22/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS1, Tranche 58 (36 documents)	0.90	195.00	175.50
11/25/19	JHG	Review daily summary of S. Siff to identify and analyze strategic litigation issues.	1.20	765.00	918.00
11/25/19	JHG	Review ECF 9334 regarding relief from stay.	0.30	765.00	229.50
11/25/19	JHG	Review ECF 9337 regarding 2004 discovery.	0.40	765.00	306.00
11/25/19	JHG	Review and analyze PREPA ECF 1785 regarding exclusion of testimony.	0.50	765.00	382.50
11/25/19	JHG	Review and analyze objection of AAAF regarding appointment of trustee from "pay go" legislation.	1.20	765.00	918.00
11/25/19	JHG	Review and analysis of ECF 36 in 19-00361 regarding ERS bondholder claims.	1.40	765.00	1,071.00
11/25/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50

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11/25/19	JA	Strategize with Jesus Suarez regarding Citi claims (.4); review correspondence to Special Claims Committee regarding settlement issues for Citi (.2)	0.60	575.00	345.00
11/25/19	JMS	Work on legal theories for injunction of competing claims by MARRERO plaintiffs in the underwriter litigation (1.4); provide additional analysis to SCC re CITI swap termination transfers (2.3); strategize with J. Arrastia (.4)	4.10	500.00	2,050.00
11/25/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 401 - 441) (2.5). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 442 - 542) (3.0).	5.50	565.00	3,107.50
11/25/19	IRS	Review docket entry updates relating to ERS and other Adversary proceedings from S. Siff.	0.30	350.00	105.00
11/25/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 46 (49 Documents).	3.50	465.00	1,627.50
11/25/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 28 (24 documents).	3.70	375.00	1,387.50
11/25/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 29 (43 documents).	3.50	375.00	1,312.50
11/25/19	SS	Review and rAnalyze database documents produced by Kobre and Kim, completed Batch SS1, Tranche 58, started batch SS2, Tranche 1 (total of 89 documents)	1.50	195.00	292.50
11/26/19	JHG	Review S. Siff daily summary to identify and analyze strategic litigation issues.	0.60	765.00	459.00
11/26/19	JHG	Review ECF 9323 regarding creditor matrix.	0.20	765.00	153.00
11/26/19	JHG	PREPA- Review and analyze ECF 1782, Fuel Line Lenders supplemental brief.	0.90	765.00	688.50
11/26/19	JHG	Review ECF 1784 regarding supplemental brief regarding bond trustee's proof of claims.	0.50	765.00	382.50
11/26/19	JHG	Review and analyze Fuel Line Lenders supplemental brief regarding UCC objection to bond trustee's proof of claims.	2.30	765.00	1,759.50
11/26/19	JHG	Review and analyze bondholder parties brief ECF 1783.	0.60	765.00	459.00
11/26/19	JA	Confer with SCC and Committee counsel regarding Status Report to be filed with court (.2)	0.20	575.00	115.00
11/26/19	JA	Prepare for meeting with Committee regarding Walmart Adv. and review case file (1.4); confer with counsel for Walmart (.3); investigation into Walmart payment (1.8); attention to Motion to Dismiss in 19-00361 and violation of Stay (.3)	3.80	575.00	2,185.00

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11/26/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 543 - 573) (1.4)	5.90	565.00	3,333.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 574 - 617) (2.7)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 618 - 700) (1.8)			
11/26/19	AMC	Detailed review and analysis of PBA bond issuances, 2007-2014 Go Bond issuances, and 2008 issuances and cross reference same against allegations of complaint filed in 19-280.	4.70	375.00	1,762.50
11/26/19	AMC	Attend to preparation of Rule 24 (c) complaint in intervention.	4.90	375.00	1,837.50
11/26/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 30 (68 documents).	3.90	375.00	1,462.50
11/26/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 31 (70 documents).	3.40	375.00	1,275.00
11/26/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.40	195.00	78.00
11/26/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 2, (56 documents)	1.30	195.00	253.50
11/27/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
11/27/19	JHG	Review ECF 9350 regarding Duff & Phelps motion for summary judgment.	0.80	765.00	612.00
11/27/19	JHG	Review ERS 728, renewed motion of certain creditors seeking appointment of trustee.	0.60	765.00	459.00
11/27/19	JHG	Review ECF 728, objection of retired employees regarding appointment of trustee to pursue claims.	0.80	765.00	612.00
11/27/19	JHG	Review email from J. Arrastia (.4) and affidavit and motion to dismiss Walmart complaint (.9)	1.30	765.00	994.50
11/27/19	JHG	Review and analyze email from Alex Bongartz regarding mediation and testimony in connection with 9019 motion.	1.60	765.00	1,224.00
11/27/19	JA	Receive and review correspondence from counsel for Walmart and declarations (.3); strategize (.1)	0.40	575.00	230.00
11/27/19	JMS	Work on legal theories for injunction of competing claims by MARRERO plaintiffs in the underwriter litigation.	2.70	500.00	1,350.00
11/27/19	JA	Confer and strategize with Angelo Castaldi regarding Monoline insurer's Notice of Removal and case issues relating to UCC position and options.	0.70	575.00	402.50

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11/27/19	JA	Prepare materials for oral argument at Omnibus Hearing.	1.80	575.00	1,035.00
11/27/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 701 - 743)	2.20	565.00	1,243.00
11/27/19	AMC	Reviewed and analyzed "interim report and recommendations of the mediation team" [ECF No. 9365].	0.70	375.00	262.50
11/27/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 32 (57 documents).	3.50	375.00	1,312.50
11/27/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 33 (40 documents).	3.80	375.00	1,425.00
11/27/19	JZ	Receipt and review of internal report circulated by S. Siff.	0.20	195.00	39.00
11/27/19	JZ	Receipt and review of Mediation Team's Interim Report and Recommendation and proposed Order; verify that objection deadline was calendared per last stay order; update electronic case profile.	0.40	195.00	78.00
Subtotal: B191 / General Litigation			511.30		\$247,439.00
B210 / Debtors' Fiscal Plan					
11/18/19	MGG	Review Doc No 9223 Objection to Joint Plan of Adjustment filed by Creditor PFZ Properties Inc.	0.30	575.00	172.50
Subtotal: B210 / Debtors' Fiscal Plan			0.30		\$172.50
Total			707.30		\$305,501.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	92.60	765.00	70,839.00
JMS	Jesus M Suarez	Partner	43.20	500.00	21,600.00
MAF	Michael A Friedman	Partner	1.20	550.00	660.00
ALG	Alfredo L Gonzalez	Partner	77.90	565.00	44,013.50
MGG	Mariaelena Gayo-Guitian	Partner	29.70	575.00	17,077.50
JA	John Arrastia	Partner	52.10	575.00	29,957.50
IRS	Irina R Sadovnic	Associate	42.20	350.00	14,770.00
JPB	JP Bado	Associate	118.10	375.00	44,287.50
AMC	Angelo M Castaldi	Associate	42.30	375.00	15,862.50
JAF	Juan A Fernandez-Barquin	Associate	23.00	465.00	10,695.00
JNS	Jessey N Sardina	Paralegal	2.20	75.00	165.00
CE	Carolyn Esser	Paralegal	1.60	150.00	240.00
CBH	Colleen B Hopkins	Paralegal	17.20	195.00	3,354.00
SS	Steve Siff	Paralegal	145.40	195.00	28,353.00
JZ	Johana Zamora	Paralegal	18.60	195.00	3,627.00
Total			707.30		\$305,501.50

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Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	217.40
11/30/2019	Data management and hosting (12272-001) Trustpoint.One 19-07867	7,016.43
Total Costs incurrent and advanced		<hr/> \$7,233.83
Current Fees and Costs		<hr/> \$312,735.33

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2020
Please Refer to
Invoice Number: 96725

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Nov 30, 2019

92,388.00

Costs incurred and advanced

57.30

Current Fees and Costs Due

92,445.30

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2020

Please Refer to

Invoice Number: 96725

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Nov 30, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
11/27/19	JZ	Review of all case dockets and calendar; create outline of all matters scheduled for hearing on December 11th for J. Arrastia's review.	0.70	195.00	136.50
Subtotal: B110 / Case Administration			0.70		\$136.50
B113 / Pleadings Review					
11/20/19	MGG	Review PREPA documents related to 9019 Settlement motion as it impacts pending litigation (i) Doc No. 1753 UCC's Motion in Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation (ii) Doc No 1755 and 1757 Urgent Motion for an Order in Limine Precluding the Official Committee of Unsecured Creditors from Entering Expert Report into Evidence at the 9019 Motion Hearing (PREPA. 1725 and 1739.	0.50	575.00	287.50
Subtotal: B113 / Pleadings Review			0.50		\$287.50
B150 / Meetings of Creditors					
11/01/19	JA	Prepare status update to Committee.	1.30	575.00	747.50
11/05/19	JA	Prepare status update to Committee regarding pending issues.	1.60	575.00	920.00
11/11/19	JA	Confer with Committee regarding case issues.	0.80	575.00	460.00
11/12/19	JA	Prepare communication to Committee regarding case issues (.8); confer with opposing counsel regarding stay (.1); review draft Motion for Extension (.1); and revise same (.1).	1.10	575.00	632.50
Subtotal: B150 / Meetings of Creditors			4.80		\$2,760.00

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B160 / Fee/Employment Applications

11/04/19	MGG	Review Doc No. 1698 Limited Objection and Reservation of Rights by the Fee Examiner with Respect to the PREPA/AAFAF Rule 9019 Motion for PREPA RSA Approval.	0.30	575.00	172.50
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Subtotal: B160 / Fee/Employment Applications			0.30		\$172.50
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B165 / Fee-Employment Other Professionals

11/26/19	JHG	Review email from Alex Bongartz and memorandum to fee examiner on LEI expert reports.	1.10	765.00	841.50
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Subtotal: B165 / Fee-Employment Other Professionals			1.10		\$841.50
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B190 / Other Contested Matters

11/01/19	MGG	Receipt and review Affidavit of Zachary S. Zwillinger (ECFs 9079-9082) attaching exhibits supporting the UCC's Objection to Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928 and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in Restructuring Support Agreement (PREPA 1701) and Urgent Joint Motion of Government Parties and Anticipated Objectors for Seventh Revised Order Extending and Establishing Certain Deadlines Applicable to the JOint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 925 and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlement Embodied in the Restructuring Support Agreement.	0.30	575.00	172.50
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11/01/19	AMC	Preliminary review of Official Committee's objection to the FOMB's motion to approve settlements embodied in plan restructuring agreement (1.3); strategize with J. Arrastia (.4)	1.70	375.00	637.50
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11/05/19	ARD	Review litigation materials and review of Bankruptcy Restructuring Agreement's potential impact on claims and rights.	2.30	625.00	1,437.50
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11/05/19	JA	Review expert report regarding RSA 9019 along with exhibits and expert models (3.8)	3.80	575.00	2,185.00
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11/06/19	JA	Review and analyze Motion to Strike Testimony of Chapados.	0.90	575.00	517.50
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11/07/19	JA	Review court order (.1); review Motion in Limine (.3)	0.40	575.00	230.00
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11/07/19	JZ	Review and index expert reports relating to the PREPA RSA 9019	0.30	195.00	58.50
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11/08/19	JZ	Receipt and review of the Urgent Motion of the FOMB and AAFAF for an order in limine to preclude the Official Committee of Unsecured Creditors from offering into evidence at the hearing on the 9019 Motion [ECF No. 1725] and the Urgent Motion to Seal said filing [ECF No. 7126]; update electronic case profile.	0.30	195.00	58.50
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11/09/19	IRS	Review PREPA 9019 pleadings and related documents.	1.90	350.00	665.00
11/11/19	ARD	Review RSA regarding litigation targets, bond issuance, and 9019 interrelation and strategize regarding same.	2.30	625.00	1,437.50
11/11/19	JA	Review materials in anticipation of Committee call on strategy (.1); attention to mediation issues and status (.2)	0.30	575.00	172.50
11/12/19	ARD	Review joint status report in detail regarding limitations on RSA and begin to compare definitive RSA revised.	1.70	625.00	1,062.50
11/12/19	JA	Review court order regarding briefing schedule (.1)	0.10	575.00	57.50
11/13/19	JA	Review objection to Motion to Seal [DE 1732] (.3); review response to Grijalva Motion [DE 1733] (.5).	0.80	575.00	460.00
11/14/19	JA	Receive and review Objection to Motion in Limine [DE1736].	0.20	575.00	115.00
11/15/19	ARD	Conference with J. Suarez regarding litigation targets (.2) and review amended complaint regarding 9019 (.4)	0.60	625.00	375.00
11/15/19	JZ	Receipt and review of Motion to Stay Adversary Proceeding in the Fuel Oil matter; receipt of Notice of Hearing on same; circulate motion; calendar hearing date and objection deadline; update electronic case profile.	0.40	195.00	78.00
11/15/19	JZ	Receipt and review of Defendant's Urgent Motion for Extension of Time to Answer Complaint filed in the Fuel Oil adversary; circulate same; update electronic case profile.	0.20	195.00	39.00
11/18/19	AMC	Regarding Rule 9019 contested matter, reviewed and analyzed FOMB's reply in further support of limine motion [PREPA 1774]	0.70	375.00	262.50
11/20/19	JA	Receive and review Order Granting Motion in Limine.	0.20	575.00	115.00
11/21/19	ARD	Review 9019 documents.	0.90	625.00	562.50
11/21/19	JA	Review Committee correspondence regarding case strategy.	0.20	575.00	115.00
11/21/19	JA	Review errata of Chapados.	0.10	575.00	57.50
11/26/19	JA	Review Opposition to Motion in Limine or Exclude Deposition of Fredric Chapados (.4) and strategize regarding same, including review and analysis of transcript (1.2).	1.60	575.00	920.00
Subtotal: B190 / Other Contested Matters			22.20		\$11,791.50
B191 / General Litigation					
11/01/19	ARD	Continued analysis of impact to litigation claims from RSA/9019.	2.10	625.00	1,312.50

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11/01/19	MAF	Review, proof read most current draft of updated version of amended complaint that incorporates changes proposed by co-plaintiff (1.4); conference call with GJB and counsel for the SCC to discuss to finalize distinctions between versions of amended complaint, including evaluation of questions regarding facts about timeline as it relates to factual support for certain claims (0.3); strategize with J. Arrastia (.4).	2.10	550.00	1,155.00
11/01/19	JA	Review and revise draft Complaint (1.8); strategize with Angelo Castaldi regarding addition of defendants (.4); strategize with Mike Friedman regarding specific legal issues in Complaint (.4); confer and strategize with co-plaintiff counsel (.6); additional revisions to Amended Complaint (.6); confer with SCC regarding remaining issues (.3); revisions to Complaint (.4); review, revise and finalize exhibits (.9); review email correspondence from May Orenstein (.2); additional correspondence and comments from May Orenstein (.2).	5.80	575.00	3,335.00
11/01/19	MGG	Receipt and review (i) Urgent Motion to File Under Seal Unredacted Version of Objection Filings of Cortland Capital Market Services, LLC , as Administrative Agent, and Solus to Prepa Bondholder Settlement; (ii) Official Committee of Unsecured Creditors' Objection to Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928 and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in Restructuring Support Agreement; (iii) Declaration of Scott Martinez in Support of Official Committee of Unsecured Creditors' Objection to Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928 and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlements Embodied in Restructuring Support Agreement; (iv) Urgent Motion to File under Seal Official Committee of Unsecured Creditors' Objection to Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 925 and Bankruptcy Rules 3012(a)(1) and 9019 for Order Approving Settlement Embodied in Restructuring Support Agreement; and (v) Order Setting Deadline for Joint Status Report in Connection with Objection of Official Committee of Unsecured Creditors to Proof of Claim Number 18449 filed by U.S. Bank National Association, In Its Capacity as Trustee for Non-Recourse PREPA Bonds.	0.30	575.00	172.50
11/01/19	JZ	Revise and finalize excel spreadsheets listing transfers (1.0); assist in retrieving and indexing exhibits to be used in Amended Fuel Oil complaint (1.0); review of Amended Complaint to review transfer amounts for accuracy compared to exhibits (.9); revise, finalize and file Amended Complaint (.7); coordinate service with PrimeClerk (.3)	3.90	195.00	760.50
11/01/19	JNS	Continue work finalizing transfers' spreadsheets, and preparing each transfer year referenced in the Amended Complaint in the necessary format to be attached as an exhibit of the same complaint (segregate by year, format to print legible, convert to pdf and combine with exhibit cover sheet)	3.70	75.00	277.50

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11/02/19	MGG	Review filing of Amended Complaint against Fuel oil suppliers.	0.30	575.00	172.50
11/04/19	MGG	Review Doc No. ECF 9090, PREPA 1716 the Seventh Revised Order Extending and Establishing Certain Deadlines Applicable to the Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922 and 928, and Bankruptcy Rules 3012(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement [ECF No. 1235] (.30); Review and update deadline extensions and matters set for January Omnibus Hearings (.20).	0.50	575.00	287.50
11/04/19	JA	Review correspondence with class action counsel (.2); email correspondence with May Orenstein (.1).	0.30	575.00	172.50
11/04/19	MGG	Review and study Doc No. 9071- Committee's Objection to Join Motion of PREPA and AAFAF for Order Approving Settlements Embodied in Restructuring Support Agreement (151 pages) (.40); Review responses and Objections filed by Fuel Line Lenders (9068); Utier/SREAEE (1697) and U.S. Bank National Association, as the PREPA Bond Trustee (Doc No. 9062). (.50). Consider objections and impact on pending litigation (.20).	1.10	575.00	632.50
11/05/19	JHG	Review email from Seth Cohen and analysis of strategic issues regarding stay of litigation.	1.20	765.00	918.00
11/05/19	JA	Receive and review correspondence from Vitol defendant counsel.	0.20	575.00	115.00
11/05/19	MGG	Review Doc No. 1719 and monitor the status of discovery and depositions in connection with PREPA 9019 Motion.	0.30	575.00	172.50
11/05/19	AMC	Analyze as-filed amended adversary complaint filed in Adv. Case No. 19-00388	0.40	375.00	150.00
11/06/19	JA	Strategize regarding SCC discussion relating to stay of Class Action Complaint and impact on pending and interrelated claims.	1.60	575.00	920.00
11/06/19	JMS	Attention to stay issues, call with SCC counsel, review issues with Vitol.	3.40	500.00	1,700.00
11/06/19	JZ	Receipt and review of Marrero Plaintiff's Motion for Extension of Time To Reply to Oppositions to Motion to Intervene; circulate same and update electronic case profile.	0.20	195.00	39.00
11/07/19	JA	Receive and review court order.	0.10	575.00	57.50
11/07/19	MGG	Review Doc No. PREPA 1721 and monitor the proceedings affecting 9019 Litigation. Review Court's Memorandum Order overruling the UCC's Objection and allowing the September 16, 2019 Order to stand re: deposition of Jose Ortiz.	0.20	575.00	115.00

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11/07/19	JZ	Receipt and review of Order Granting Marrero Plaintiff's Motion for Extension of Time To Reply to Oppositions to Motion to Intervene; calendar response deadline; circulate same and update electronic case profile.	0.30	195.00	58.50
11/08/19	JA	Receive and review proposed SCC Motion to Stay (.6) and strategize regarding same (.5)	1.10	575.00	632.50
11/08/19	JMS	review issues with tolling agreements and amended complaints, work on stay issues.	1.80	500.00	900.00
11/08/19	AMC	Reviewed initial draft of motion to stay proceedings proposed by Special Claims Committee	0.70	375.00	262.50
11/11/19	JHG	Review and analysis of ECF 1725, urgent motion for an order in limine in PREPA.	0.40	765.00	306.00
11/11/19	JHG	Continued review of PREPA Fuel Oil "hot docs."	2.40	765.00	1,836.00
11/11/19	JMS	Provide review and input concerning opposition to stay, intervention of marrero plaintiffs and litigation (1.3); careful review of PR proceedings relating to Vitol in support of same (1.5)	2.80	500.00	1,400.00
11/11/19	MGG	Review Doc No. 1724: Magistrate's Order Granting Motion to Seal for Limited Duration and for Supplemental Briefing, entered on the Urgent Motion to File under Seal Unredacted Version of Objection filings of Cortland Capital market Services, LLC, as Administrative Agent, and Solus to PREPA Bondholder Settlement (PREPA Motion to Seal Doc No. 1704).	0.20	575.00	115.00
11/12/19	JHG	Review PREPA draft Fuel Oil complaint and exhibits.	3.70	765.00	2,830.50
11/12/19	JHG	Review and analysis of draft PREPA motion to stay adversary proceeding.	2.60	765.00	1,989.00
11/12/19	JZ	Receipt and review of Order setting Briefing Schedule on the Urgent Motion to Limine to Preclude Expert Reports; calendar deadlines contained in Order; circulate same; update electronic case profile.	0.30	195.00	58.50
11/13/19	JHG	Review email from Mae Orenstein, PREPA and attached draft urgent consent motion.	0.30	765.00	229.50
11/13/19	JA	Confer with SCC counsel regarding draft order (.1); email correspondence to SCC counsel regarding draft motion (.2); analyze pending removal of Commonwealth proceedings (multiple) (2.1).	2.40	575.00	1,380.00
11/14/19	JA	Review email correspondence from SCC regarding class action Plaintiffs (.3); review underlying class action case order (.4); strategize with Jesus Suarez regarding SCC position on stay (.4); strategize with Jesus Suarez regarding Vitol Notice of Removal (.3).	1.40	575.00	805.00

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11/14/19	JMS	Extensive calls and follow up research with SCC counsel regarding scope of stay, counterclaim by VITOL and request for remand (2.4); attention to issues raised by VITOL concerning breach of contract claims (1.4)	3.80	500.00	1,900.00
11/14/19	MGG	Review REPA Doc No.1736 as it relates to the 9019 Motion - the Government Parties' Urgent Motion for an Order In Limine Precluding the Official Committee of Unsecured Creditors from Entering Expert Report Into Evidence at the 9019 Motion Hearing [PREPA 1725].	0.20	575.00	115.00
11/14/19	IRS	Review Vitol answer to amended Fuel Oil complaint and internal correspondence related thereto. (.7) Review notice of removal and supporting documents filed by Vitol. (.6) Review brief analysis of Vitol Affirmative defenses and counterclaims. (.3)	1.60	350.00	560.00
11/14/19	AMC	Preliminary review of Vitol, Inc.'s Answer to PREPA's Amended Complaint and removal documents.	1.20	375.00	450.00
11/14/19	JZ	Receipt and review of Order Granting Motion to Seal For Limited Duration and Supplemental Briefing [ECF No. 1738] ; calendar deadlines contained in order; update electronic case profile.	0.30	195.00	58.50
11/14/19	JZ	Receipt and review of Defendants' Answer and Counterclaims in the Fuel Oil adversary; calendar deadline to file response to counterclaims; update electronic case profile.	0.30	195.00	58.50
11/14/19	JZ	Attention to the Notice of Removal filed by the Vitol defendants; conference with J. Sardina regarding indexing exhibits and creating binders of same.	0.40	195.00	78.00
11/14/19	JNS	Review emails from Steve Stiff and J Zamora, Download and save electronic copy of the Notice of Removal filed by the Vitol defendants purporting to remove litigation styled as Autoridad de Energía Eléctrica de Puerto Rico v. Vitol Inc., et al., Civil No. K AC2009-1376	0.40	75.00	30.00
11/15/19	JHG	Continued review of document in connection with PREPA Fuel Oil complaint.	2.60	765.00	1,989.00
11/15/19	JA	Receive and review Vitol Answer and Counterclaim (2.3); receive and review Motion to Stay filed by SCC (.3).	2.60	575.00	1,495.00
11/15/19	JMS	Review Vitol answer, removal pleadings (2.8) and brief team (.4)	3.20	500.00	1,600.00
11/15/19	MAF	Conference with J Suarez regarding answer, defenses, notice of removal filed by Vitol, begin review of the same (0.4).	0.40	550.00	220.00
11/15/19	JMS	Confer and strategize with A. Day regarding litigation targets.	0.40	500.00	200.00

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11/15/19	JZ	Receipt and review of Urgent Motion to Seal Documents in connection with their Reply In Support of Urgent Motion For an Order In Limine Precluding the Official Committee of Unsecured Creditors From Entering Expert Report Into Evidence at the 9019 Motion Hearing [ECF No. 1745]; circulate same; update electronic case profile.	0.20	195.00	39.00
11/15/19	JZ	Receipt and review of PREPA's Motion for Entry of Order Pursuant to Rule 9006(b) of the Federal Rules of Bankruptcy Procedure Further Enlarging the Time Within Which to File Notices of Removal Pursuant to Bankruptcy Rule 9027; calendar hearing date and objection deadline; update electronic case profile.	0.30	195.00	58.50
11/16/19	JA	Receive and review Notice of Removal by Vitol and related filings (3.2) and strategize reagarding same (1.2); strategize with J. Suarez (.4)	4.80	575.00	2,760.00
11/18/19	JA	Review correspondence from SCC regarding draft motion regarding extension (.1); review correspondence from counsel regarding language of motion (.2).	0.30	575.00	172.50
11/18/19	JMS	Review issues related to fuel oil stay motion by SCC and amended claims against Vitol	2.40	500.00	1,200.00
11/18/19	MGG	Review PREPA Doc No. 1744- FOMB's Reply in further support of its Urgent Motion for an Order in Limine Precluding the Official Committee of Unsecured Creditors from Entering Expert Report into Evidence at the 9019 Motion Hearing and consider impact on approval of 9019 Motion.	0.30	575.00	172.50
11/18/19	AMC	Reviewed order of court filed in 19-388 concerning extension of time pending stay	0.20	375.00	75.00
11/18/19	AMC	Review of as-filed Motion to Stay proceedings filed by special claims committee in 19-388.	0.90	375.00	337.50
11/18/19	JZ	Receipt and review of Order Granting Motion to Seal relating to PREPA ECF. 1745) for Limited Duration and for Supplemental Briefing; calendar deadline to file brief; update electronic case profile.	0.20	195.00	39.00
11/18/19	JZ	Receipt and review of Order Granting Urgent Consent Motion for Extension of Time to Respond to Plaintiffs Amended Complaint; circulate same; conference with I. Sadovnic regarding the order and last week's filings; update electronic case profile	0.40	195.00	78.00
11/19/19	JA	Review and analyze memoranda regarding Vitol procedural history (.3); review Notice of Removal and strategy covering portion of client (1.8); continued analysis of strategy regarding counterclaims and impact on claims (1.2).	3.30	575.00	1,897.50
11/19/19	JMS	Attention to fuel oil litigation, stay issues and call with Vitol	2.40	500.00	1,200.00
11/19/19	IRS	Strategize regarding Vitoil v. PREPA action and its effect on UCC claims.	0.40	350.00	140.00

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11/20/19	ARD	Continue attention to 9019 and litigation issues.	1.80	625.00	1,125.00
11/20/19	JA	Analyze Vitol counterclaims and strategize with Notice of Removal regarding litigation strategy (1.2); strategize with Irina Sadovnic regarding Puerto Rico law claims (.3); confer with Scott Martinez regarding preference action analysis (.1).	1.60	575.00	920.00
11/20/19	AMC	Detailed analysis of motion to impose stay filed by Special Claims Committee in Adv. Case No. 19-388, and review of scheduling orders / deadlines concerning the same	2.10	375.00	787.50
11/20/19	AMC	In conjunction with litigation concerning PREPA's purchase of fuel oil, reviewed and analyzed historic purchase data vis-a-vis Vitol entities, and analyzed applicable contracts under which fuel was purchased and sold	1.60	375.00	600.00
11/21/19	ARD	Review Marrero opposition (.6); conference with J. Suarez regarding same (.3)	0.90	625.00	562.50
11/21/19	MGG	Review Doc No. 1757 - copy of Order Granting the Urgent Motion for an Order in Limine Precluding the Official Committee of Unsecured Creditors from Entering Expert Report into Evidence at the 9019 Motion Hearing (PREPA 1725 and 1739) and consider impact on 9019 motion.	0.30	575.00	172.50
11/21/19	JMS	Prepare for and participate in call with SCC concerning Fuel Oil action (1.4); prepare for and participate in call with Vitol concerning Fuel Oil action and followup regarding same (1.3); research in support of UCC's analysis of removed action (2.2); strategize with J. Arrastia (.6)	5.50	500.00	2,750.00
11/21/19	JA	Conferences with counsel for Special Claims Committee regarding Fuel Oil Claims (.3); confer with Fuel Oil Claim defendants and special claims counsel (.4); confer with Fuel Oil Claim defendants (.2); strategize with Jesus Suarez regarding Fuel Oil Claims and Notice of Removal (.6); strategize regarding Motion for Stay (.5).	2.00	575.00	1,150.00
11/21/19	JA	Receive and review Marrero Plaintiffs Combined Reply regarding Motion to Intervene and Motion to Stay (.6) and research case file as referenced in Reply (.8); strategize with Angelo Castaldi regarding SCC Motion to Stay (.5).	1.90	575.00	1,092.50
11/21/19	IRS	Review Marrero Plaintiffs' reply in support of motion to intervene and opposition to motion to stay and internal correspondence regarding same. (.8)	0.80	350.00	280.00
11/21/19	AMC	Review of authorities cited by co-plaintiff in support of "stay" of Adv. 19-388, and analyze the applicable standard under Landis and progeny (1.8); strategize with J. Arrastia regarding Motion for Stay (.5)	2.30	375.00	862.50
11/21/19	AMC	Preparation of draft response/opposition to Motion to Stay filed by Oversight Board in Adv. Case No.: 19-388.	7.40	375.00	2,775.00
11/21/19	AMC	Prepare for and attend call with S.C.C. concerning Vitol claims, defenses (.9); analyze strategies concerning Vitol counterclaims and removal arguments (.7).	1.60	375.00	600.00

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11/21/19	JZ	Receipt and review of Marrero Plaintiff's Reply in Support of Motion to Intervene in the Fuel Oil adversary; circulate same; internal conference regarding filing; update electronic case profile.	0.40	195.00	78.00
11/22/19	MGG	Review PREPA docket and Doc No. 1767 UCC's supplemental brief (i) addressing whether the UCC's standing to object to US Bank's proof of claim and (ii) the request for hearing and adjudication of the Objection notwithstanding 9019 Motion (.30); and Doc No. 1769 The Government Parties' position regarding the UCC's lack of standing (.30). Consider impact on 9019 Motion (.20).	0.80	575.00	460.00
11/22/19	JMS	Research in support of Motion to Stay filed by SCC.	2.40	500.00	1,200.00
11/23/19	MAF	Review draft response to FOMB motion for stay and conduct legal research with respect to the same (3.5);	3.50	550.00	1,925.00
11/24/19	MAF	Further legal research and apply redline revisions to draft response to stay motion, email to group regarding the same (4.0).	4.00	550.00	2,200.00
11/24/19	JA	Extensive revisions to Opposition to Motion to Stay Fuel Oil Complaint, including legal research and analysis.	3.10	575.00	1,782.50
11/25/19	MAF	Conference with J Arrastia regarding revisions to draft stay response (0.2); conference with A Castaldi regarding the same (0.6);	0.80	550.00	440.00
11/25/19	JA	Review revisions to Motion to Stay (.6); revise Motion to Stay Fuel Oil Complaint (1.3); review correspondence from SCC regarding extension (.1); review additional comments to opposition from local counsel (.4); review Statement of No Objection [DE 44] (.1); review email correspondence from opposing counsel (.1); review and revise next version of Opposition to Motion to Stay (.9); confer with M. Friedman (.2)	3.70	575.00	2,127.50
11/25/19	AMC	Revise and finalize Opposition to Motion to Stay for filing (7.9); confer with M. Friedman (.6)	8.50	375.00	3,187.50
11/26/19	MAF	Review next draft of opposition to SCC's stay motion, provide comments and conference with group regarding the same (0.7); conference with group regarding page limit and style issues and provide example to group (0.2).	0.90	550.00	495.00
11/26/19	JA	Revise and finalize Opposition to Motion for Stay (.8); confer with opposing counsel (.1); confer with SCC regarding proposed Motion on Extension of Time (.3); review Vitol Opposition to Motion for Stay (.2); additional correspondence with SCC regarding extension (.2); review correspondence from Vitol counsel regarding enlargement (.1)	1.70	575.00	977.50
11/26/19	AMC	Review, analyze and prepare for filing: the final draft opposition to the Motion to Stay filed by FOMB.	1.20	375.00	450.00
11/26/19	AMC	Reviewed and analyzed Statement of No objection and Reservation of Rights filed by certain adversary defendants in Adv. Case No. 19-388	0.20	375.00	75.00

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11/26/19	JZ	Receipt and review of Defendants' statement of non objection and reservation of rights in connection with the Special Claims Committee's Motion to Stay Adversary Proceeding in the Fuel Oil matter; circulate same; update electronic case profile.	0.20	195.00	39.00
11/26/19	JZ	Internal conferences regarding Response in Opposition to FOMB's Motion to Stay Adversary Proceeding (.3); revise, finalize and file same (.4); update electronic case profile (.1)	0.80	195.00	156.00
11/26/19	JZ	Receipt and review of Vitol's Objection to Motion to Stay Adversary; circulate same; update electronic case profile.	0.30	195.00	58.50
11/27/19	JMS	Review issues with tolling agreements in Fuel Oil Case (.8); review issues arising from Motion to Stay and opposition briefing (1.3).	2.10	500.00	1,050.00
11/27/19	AMC	Attend to drafting of complaint in intervention regarding Adv. Case No. 19-280.	6.20	375.00	2,325.00
11/27/19	JZ	Receipt and review of SCC's Urgent Agreed Motion for Extension of Time to Respond to Counterclaims; circulate same; receipt and review of Order granting extension of time; calendar response deadline; review of S. Siff's e-mail regarding his insight on the SCC's filing; update electronic case profile.	0.40	195.00	78.00
11/29/19	AMC	Detailed review and analysis of (i) Vitol entities' answer, affirmative defenses, and counterclaim, and (ii) Vitol entities' notice of removal and related pre-removal filings	3.80	375.00	1,425.00
Subtotal: B191 / General Litigation			156.40		\$76,398.50
Total			186.00		\$92,388.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
ARD	Allison R Day	Sr. Partner	12.60	625.00	7,875.00
JHG	John H Genovese	Sr. Partner	14.30	765.00	10,939.50
JMS	Jesus M Suarez	Partner	30.20	500.00	15,100.00
MAF	Michael A Friedman	Partner	11.70	550.00	6,435.00
MGG	Mariaelena Gayo-Guitian	Partner	5.60	575.00	3,220.00
JA	John Arrastia	Partner	51.30	575.00	29,497.50
IRS	Irina R Sadovnic	Associate	4.70	350.00	1,645.00
AMC	Angelo M Castaldi	Associate	40.70	375.00	15,262.50
JNS	Jessey N Sardina	Paralegal	4.10	75.00	307.50
JZ	Johana Zamora	Paralegal	10.80	195.00	2,106.00
Total			186.00		\$92,388.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	57.30

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Total Costs incurrent and advanced	\$57.30
Current Fees and Costs	\$92,445.30

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2020
Please Refer to
Invoice Number: 96726

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Nov 30, 2019

20,251.00

Costs incurred and advanced

30.00

Current Fees and Costs Due

20,281.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

January 14, 2020

Please Refer to

Invoice Number: 96726

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Nov 30, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
11/04/19	JA	Confer with Alex Bongartz regarding ERS discovery responses and production	0.10	575.00	57.50
11/11/19	JZ	Coordinate service of the additional stay order [ECF No. 9016] in English and Spanish to the ADV defendants in 19-00364 and 19-00297.	0.30	195.00	58.50
11/12/19	JNS	Download, review and calendar deadlines set in Case 1900359 - CP 18 Order Granting Urgent Joint Motion to Modify Order Regarding Stay and Mandatory Mediation with Respect to certain Issues Raised in Certain Contested Matters and Adversary Proceedings related tot he Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico	1.10	75.00	82.50
11/13/19	IRS	Participate in conference call with ERS Counsels and accounting firms regarding ERS bond litigation support services. (1.8)	2.30	350.00	805.00
		Follow up conference call with ERS Counsels regarding selection of expert litigation support services. (.5)			
11/13/19	JNS	Continue, review and calendar of deadlines set in Case 1900359 - CP 18 Order Granting Urgent Joint Motion to Modify Order Regarding Stay and Mandatory Mediation with Respect to certain Issues Raised in Certain Contested Matters and Adversary Proceedings related tot he Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico	0.50	75.00	37.50
11/14/19	JNS	Review email from Attorney Irina Sadovnick related to Discovery Requests filed in the ERS adversariy cases. Segregate, name and save electronic copy into each related case file, the Discovery requests filed in the ERS adversaries. Conference with attorney Irina Sadovnick re same.	1.20	75.00	90.00

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11/15/19	JNS	Continue segregating, naming and saving electronic copy into each related case file, the Discovery requests filed in the ERS adversaries.	1.80	75.00	135.00
11/18/19	JNS	Download, save and re-name an electronic copy Notice of Removal and each exhibit to it, individually.	2.30	75.00	172.50
11/19/19	MGG	Review PREPA docket nos. 1745 and 1748 impact on 9019 Motion and pending litigation. PREPA, FOMB and AAFAF's Urgent Motion to Seal Documents in connection with their Reply In Support of Urgent Motion For an Order In Limine Precluding the Official Committee of Unsecured Creditors From Entering Expert Report Into Evidence At the 9019 Motion Hearing and Magistrate's order Granting Motion to Seal PREPA 1745. (.40) Review PREPA 1749 UCC's Position Regarding Sealing of Expert Report Submitted in Connection with Opposition to PREPA Bonds Rule 9019 Motion (.30).	0.70	575.00	402.50
Subtotal: B110 / Case Administration			10.30		\$1,841.00
B190 / Other Contested Matters					
11/01/19	JZ	Conference with I. Sadovnic regarding finalizing the answers to counterclaims ERS adversary proceedings (.2) ; make final revisions to same (.5) ; finalize and file answers in each ERS adversary proceeding (.8); coordinate service of same with PrimeClerk (.2); update electronic case profile (.3)	2.00	195.00	390.00
11/01/19	JZ	Receipt of FOMB and UCC's Answer to Counterclaims in ADV 19-00367; circulate same; update electronic case profile.	0.30	195.00	58.50
11/13/19	JZ	Revise and format chart of Putman transfers.	0.40	195.00	78.00
11/14/19	JZ	Conferences with I. Sadovnic regarding discovery propounded and strategy for same.	0.50	195.00	97.50
11/22/19	JZ	Receipt and review of ERS Bondholders' Motion and Request for Allowance and Payment of Post-Petition and Administrative Expense Claims; calendar objection deadline; update electronic case profile; conference with I. Sadovnic regarding filing.	0.40	195.00	78.00
Subtotal: B190 / Other Contested Matters			3.60		\$702.00
B191 / General Litigation					

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11/01/19	JA	Review correspondence from SCC regarding discovery (.1); review comments to ERS answer to counterclaims (.3); review additional revisions to interrogatories, requests for production and requests for admissions (.4); review comments from Proskauer (.3); review additional revisions to various answers to counterclaims (.1); review additional revisions (.2); review revisions to discovery (.1); review correspondence regarding additional discovery (.1); review updated answer chart to ensure uniformity and completeness of responses and discovery to all pending matters (.3); review revised discovery (.3); review additional draft of AP 367 (.1); review final draft of answers and affirmative defenses (.6).	2.90	575.00	1,667.50
11/02/19	JA	Review discovery from various ERS defendants, including requests for production and interrogatories (.5); review initial disclosures for service (.2).	0.70	575.00	402.50
11/04/19	AMC	Review, analyze, and communicate with opposing counsel concerning: dismissals entered in challenged-bond adversary proceedings, DTC data concerning applicable to challenged-bond adversary defendants, and master data compilation applicable to challenged-bond defendants	2.40	375.00	900.00
11/07/19	MGG	Monitor and review filings of Doc Nos 45, 19-00283: and 47, 19-00357, 19, 19-00288 in Adversary Proceedings, the Magistrate entered Orders granting Leave to file the Fourth Amended Adversary Complaint in 19-00283, the Third Amended Adversary Complaint in 19-00357 and Amended Complaint in 19-00288.	0.60	575.00	345.00
11/07/19	JA	Review correspondence from FOMB Counsel regarding service of Additional Stay Order translated into Spanish and attention to same	0.20	575.00	115.00
11/07/19	AMC	Address service questions concerning ERS adversary cases.	0.40	375.00	150.00
11/07/19	AMC	Attend to communications with counsel for challenged-bond defendants and analyze master transfer data concerning the same.	0.50	375.00	187.50
11/08/19	JA	Review email correspondence from Jones Day regarding specific discovery requests	0.10	575.00	57.50
11/08/19	AMC	Reviewed Order granting the Urgent Motion of the Financial Oversight and Management Board for Puerto Rico, acting through its Special Claims Committee, for Entry of an Order Authorizing the Filing of the Key to Pseudonymous Defendants Under Seal	0.20	375.00	75.00
11/08/19	AMC	Review of ECF 9126 concerning the Special Claims Committee's motion seeking the entry of an order authorizing the filing of the confidential list of third party claims under seal	0.40	375.00	150.00

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11/11/19	MGG	Consider and review email from Tristan Axelrod with draft copies of filings to (1) dismiss parties and (2) update appendices of remaining defendants as requested by the court and Informative Motion regarding same. (.40). Review follow-up email from Mr. Axelrod with additional clarifications on dismissal of defendants (.20). Monitor pending defendants (.20). Review email and request from Nicholas Bassett (.20).	1.00	575.00	575.00
11/11/19	JA	Review new clawback dismissals and information motion regarding appendix (.2) Email correspondence from SCC regarding form and agreement (.1); Email correspondence with responding parties (Retirees, ERS, FOMB, AAFAF, 4and Committees) regarding discovery responses (.4)	0.70	575.00	402.50
11/12/19	JA	Review correspondence regarding discovery from FOMB (.1)	0.10	575.00	57.50
11/12/19	IRS	Review extensive correspondence regarding ERS Discovery coordination between co-plaintiffs counsels. (.7) Strategy meeting regarding outstanding ERS discovery requests. (.3)	1.00	350.00	350.00
11/12/19	IRS	Review materials in advance of conference call between ERS counsel and financial and tax consulting firms and prepare internal correspondence regarding same. (.5)	0.50	350.00	175.00
11/13/19	MGG	Review with Angelo Castaldi adversary proceedings re: ERS bonds, deadlines and management of same. (.40). Review list of defendants, deadlines and miscellaneous issues (1.0).	1.40	575.00	805.00
11/13/19	JMS	Review issues relating to ERS adversary discovery in matters currently handled by GJB and attention to coordination of responses relating to same.	3.20	500.00	1,600.00
11/13/19	AMC	Review, analyze, and resolve questions posed by counsel for defendants in ERS litigation.	0.60	375.00	225.00
11/13/19	IRS	Confer with paralegal staff regarding internal filing of discovery requests and orders relating to GJB-involved ERS litigation matters.	0.60	350.00	210.00
11/13/19	IRS	Strategize regarding GJB involvement in ERS discovery responses and discuss pending deliverables.	0.50	350.00	175.00
11/14/19	IRS	Participate in conference call between all ERS counsel regarding coordinated responses to pending discovery. (.8) Review materials and prepare in advance of conference call. (.4) Prepare internal correspondence regarding GJB-involved cases and scope of work on pending discovery. (.4) Review draft responses to requests for production (1)	2.40	350.00	840.00

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11/15/19	IRS	Prepare brief analysis regarding ERS litigation support experts and their current and historical role in PROMESA litigation. (.6)	1.10	350.00	385.00
		Review historical filings regarding litigation support experts' advisory roles to certain parties involved in PROMESA litigation. (.5)			
11/15/19	IRS	Review responses and objections to RFPs in Adv. 19-0355 (.5)	0.80	350.00	280.00
		Prepare correspondence regarding cataloguing and case management information. (.3)			
11/17/19	IRS	Review discovery requests in ERS ADV proceedings 19-355, 356, 359, 361, and 367.	1.50	350.00	525.00
11/18/19	JA	Review revisions to Motion to Extend Deadlines.	0.10	575.00	57.50
11/18/19	IRS	Review correspondence between all ERS Counsel regarding ERS discovery update and follow-up call. (.2)	0.20	350.00	70.00
11/19/19	IRS	Prepare correspondence regarding discovery responses in AP 19-355. (.2)	0.50	350.00	175.00
		Confer regarding communications with Defendants in 19-355 and responses to Rule 2004 discovery. (.3)			
11/19/19	IRS	Review expert witness materials provided by Proskauer for ERS litigation support meetings.	0.30	350.00	105.00
11/19/19	AMC	Analyze discovery responses propounded by Sculptor Capital L.P.	0.60	375.00	225.00
11/20/19	MGG	Review ERS docket nos. 704 and 705 and potential impact on pending litigation - the Renewed Motion of the ERS Bondholders for entry of an Order appointing them as trustees, pursuant to § 926 of title 11 of the United States Code (.30) and Notice of Hearing scheduling same. Review claims listed on attached exhibit A (.30).	0.60	575.00	345.00
11/20/19	JA	Review draft Responses to Requests for Production as to Ultra Vires.	0.60	575.00	345.00
11/21/19	JA	Review correspondence from Bondholder regarding ESI (.1); review Notices of Participation (.2); review revisions to discovery responses regarding Ultra Vires (.1).	0.40	575.00	230.00
11/21/19	IRS	Review revised draft responses to discovery in ERS Adv. cases. (.6)	0.90	350.00	315.00
		Review co-Plaintiff's counsels' comments regarding draft responses to ERS Adv. cases (.3)			

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11/22/19	MGG	Review and montior ERS docket including ERS Doc No. 707 ERS Bondholders' Motion and Request for Allowance and Payment of Post-Petition and Administrative Expense Claims filed by Jones Day on behalf of ERS Bondholders(.30) and Review ERS Doc No. 708-713- Notice of Filing of the ERS Bondholders' Motion and Request for Allowance and Payment of Post-Petition and Administrative Expense Claims. (.40). Consider role and lead of UCC in the ERS Bond administrative claims itigation (.20).	0.90	575.00	517.50
11/22/19	JA	Review correspondence from Special Claims Committee regarding revisions to ERS Ultra Vires discovery responses (.1); review revised responses to discovery responses (.4); review correspondence among counsel regarding discovery responses (.1); review FOMB responses to discovery (.4); review responses of additional discovery respondents (.4).	1.40	575.00	805.00
11/22/19	IRS	Review correspondence from co-plaintiff's counsel regarding ERS discovery responses. (.5) Review final drafts of ERS discovery responses and confer with co-plaintiffs' counsel regarding GJB comments. (.8)	1.30	350.00	455.00
11/23/19	JA	Review draft Informative Motion regarding Notices of Participation.	0.10	575.00	57.50
11/24/19	IRS	Review ERS participation notices and draft informative motion.	0.50	350.00	175.00
11/25/19	MGG	Review Order Scheduling Briefing on Motions of ERS Bondholders and Fiscal Agent for Allowance and Payment of Post-Petition Administrative Expense Claims (ERS Doc No. 707, 710 and 713).	0.20	575.00	115.00
11/25/19	JA	Review proposed Informative Motion (.1); review Scheduling Order [DE 721] (.1); review Scheduling Order [DE 9322] (.1); review Order Extending Date for File Creditor Matrix [DE 9323] (.1)	0.40	575.00	230.00
11/25/19	IRS	Review correspondence regarding ERS informative motion and prepare internal correspondence with comments and recommendation.	0.40	350.00	140.00
11/26/19	MGG	Review and monitor Doc No. 9331 in connection with the Objections to the ERS Bond Claims and Exhibit A and Informative Motion listing the parties who have filed Notices of Participation (ECF 9331-1) as well as list of Adversary Proceeding Defendants who have filed Notices of Appearance (ECF 9331-2).	0.50	575.00	287.50
11/26/19	JA	Review Objection of the Committee of Retirees to the ERS Bondholders Renewed Motion for Appointment as Trustee (.4)	0.40	575.00	230.00

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11/26/19	IRS	Review correspondence regarding Motion to Dismiss in Adv, and strategize regarding stay order as applied to this action. 19-361. (.6)	1.50	350.00	525.00
		Review motion to dismiss filed in 19-361 (.5)			
		Review stay order applicable to adversary proceedings (.4)			
11/26/19	AMC	Review (preliminary) of Motion to Dismiss filed in Adv. Proc. 19-363.	0.20	375.00	75.00
11/26/19	JZ	Receipt and review of Order Scheduling Briefing on Motions of ERS Bondholders and Fiscal Agent for Allowance and Payment of Post-Petition Administrative Expense Claims; calendar deadlines contained in Order and hearing date; update electronic case profile.	0.30	195.00	58.50
11/26/19	JZ	Receipt and review of Motion to Dismiss filed by I. Rodriguez in the ADV. 19-361; circulate same; conference with A. Castaldi regarding calendaring of deadline; review of all stay orders to determine response deadline; update electronic case profile.	0.60	195.00	117.00
11/27/19	JA	Review email correspondence among responding parties regarding draft discovery (.3)	0.30	575.00	172.50
11/27/19	IRS	Review correspondence from co-plaintiffs' counsel regarding responses to ERS interrogatories and requests for admissions. (.5)	2.30	350.00	805.00
		Review draft responses to ERS interrogatories and requests for admissions. (.6)			
		Call with John Mudd, counsel for Defendant in ERS AP19-361 regarding motion to dismiss filed in violation of stay. (.3)			
		Confer regarding stay orders applicable to ERS proceedings. (.3)			
		Prepare correspondence to co plaintiff's counsel in 19-361 regarding recently filed motion to dismiss and communications with opposing counsel. (.1)			
		Participate in conference call among ERS Counsel call regarding responses to discovery. (.5)			
11/30/19	IRS	Attend to extensive correspondence regarding ERS discovery drafts from ERS Counsel and review all edits and comments made in track changes.	1.20	350.00	420.00
Subtotal: B191 / General Litigation			40.50		\$17,708.00
Total			54.40		\$20,251.00

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	3.20	500.00	1,600.00
MGG	Mariaelena Gayo-Guitian	Partner	5.90	575.00	3,392.50
JA	John Arrastia	Partner	8.50	575.00	4,887.50
IRS	Irina R Sadovnic	Associate	19.80	350.00	6,930.00
AMC	Angelo M Castaldi	Associate	5.30	375.00	1,987.50
JNS	Jessey N Sardina	Paralegal	6.90	75.00	517.50
JZ	Johana Zamora	Paralegal	4.80	195.00	936.00
Total			54.40		\$20,251.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	30.00
Total Costs incurrent and advanced		\$30.00
Current Fees and Costs		\$20,281.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020
Please Refer to
Invoice Number: 96953

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Dec 31, 2019	196,535.50
Costs incurred and advanced	<u>8,191.43</u>
Current Fees and Costs Due	204,726.93

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020

Please Refer to

Invoice Number: 96953

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Dec 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
12/04/19	JHG	Review email from Alex Bongartz regarding committee/litigation issues.	0.70	765.00	535.50
12/04/19	MGG	Telephone conference with John Arrastia re: case administration.	0.30	575.00	172.50
12/04/19	JA	Strategize with M. Guitian regarding case issues.	0.30	575.00	172.50
12/05/19	JHG	Review article in The Hill regarding debt restructure and attention to plan litigation issues.	2.40	765.00	1,836.00
12/09/19	JA	Review and analyze past billing and budgeting to determine potential reductions in future budgeting.	1.20	575.00	690.00
12/09/19	IRS	Review extensive docket entry updates from S. Siff and review agenda for December 11 omnibus hearing.	0.50	350.00	175.00
12/09/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.20	195.00	39.00
12/10/19	IRS	Review invoice for translations required under magistrate judge's order in Walmart Adv. and confirm payment authority.	0.20	350.00	70.00
Subtotal: B110 / Case Administration			5.80		\$3,690.50
B113 / Pleadings Review					
12/02/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/03/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00

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12/04/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 4 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/05/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
12/06/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/07/19	SS	Began Review and Analysis of all court filings in the Main Case, Title III cases and Adversary Proceedings late on December 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.00	195.00	390.00
12/09/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 6 through December 8 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
12/09/19	SS	Prepare digest of matters and filings from late December 6-8 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
12/09/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on February 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/09/19	SS	Prepare digest of matters and filings from December 9 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
12/10/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on December 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/10/19	SS	Prepare digest of matters and filings relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
12/10/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/10/19	SS	Prepare digest of matters and filings on December 10 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00

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12/11/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late November 10 in order to 1.8 prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
12/11/19	SS	Prepare digest of matters and filings late on December 10 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/11/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/11/19	SS	Prepare digest of matters and filings on December 11 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/12/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on December 11 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/12/19	SS	Prepare digest of matters and filings late on December 11 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
12/12/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/12/19	SS	Prepare digest of matters and filings on December 12 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/13/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/13/19	SS	Prepare digest of matters and filings from late December 12 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
12/13/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 13 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
12/13/19	SS	Prepare digest of matters and filings on December 13 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50

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12/16/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings for late December 13 through December 15 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
12/16/19	SS	Prepare digest of matters and gfilings from late December 13 through December 15 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
12/16/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 16 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/16/19	SS	Prepare digest of matters and filings on December 16 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/17/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 16 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
12/17/19	SS	Prepare digest of matters and filings from late December 16 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/17/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
12/17/19	SS	Prepare digest of mattersand filings on December 17 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50
12/18/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 17 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/18/19	SS	Prepare digest of matters and flings from late December 17 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/18/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
12/18/19	SS	Prepare digest of matters and filings on December 18 relevant to special litigation counsel and distribute to appropriate team members.	1.50	195.00	292.50

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12/19/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 18 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/19/19	SS	Prepare digest of matters and filings from late December 18 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/19/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/19/19	SS	Prepare digest of matters and filings on December 19 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
12/20/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 19 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/20/19	SS	Prepare digest of matters and filings on December 20 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/23/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from DEcmber 20 through December 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
12/23/19	SS	Prepare digest of matters and filings from December 20 through December 22, relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
12/23/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 23 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
12/24/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from Late December 23 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/24/19	SS	prepare digest of matters and filings from Late December 23 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
12/26/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from December 24 through December 25 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50

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12/26/19	SS	Prepare digest of matters and filings from late December 24 and December 25, relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/26/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/26/19	SS	Prepare digest of matters and filings on December 26 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/27/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings late on December 26 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
12/27/19	SS	Prepare digest of matters and filings from late December 26 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/27/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
12/27/19	SS	Prepare digest of matters and filings on December 27 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
12/30/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 27 through December 29 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
12/30/19	SS	Prepare digest of matters and filings from late December 27 through December 29 relevant to special litigation counsel and distribute to appropriate team members.	1.00	195.00	195.00
12/30/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on December 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
12/30/19	SS	Prepare digest of matters and filings on December 30 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
12/31/19	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
12/31/19	SS	Prepare digest of matters and filings from late on December 30 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00

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Subtotal: B113 / Pleadings Review			93.00		\$18,135.00
B160 / Fee/Employment Applications					
12/02/19	MGG	Revise and finalize Fee Payment Letter for August Invoices (.30). Finalize draft of Monthly Fee Objection letter from C. Hopkins re: September invoices. (.30).	0.60	575.00	345.00
12/02/19	CE	Draft letter requesting payment for September fees. E-mail correspondence with M. Guitian re: same.	0.50	150.00	75.00
12/03/19	JHG	Review August GJB fee request.	0.40	765.00	306.00
12/03/19	MGG	Email to and from Ken Forrest and John Arrastia re: status of pending payment for April and May Holdbacks (.20). Follow up with Valerie Soler (.20). Receipt and review email from Ms. Soler with summary of review for payment of holdback amounts (.40). Internal review of holdback amounts and confirmation of Ms. Soler's calculations (.60).	1.40	575.00	805.00
12/03/19	MGG	Finalize and approve service of September 2019 Monthly Fee Objection Statement.	0.30	575.00	172.50
12/03/19	JA	Email with M. Guitian re: fee issues.	0.10	575.00	57.50
12/03/19	CBH	Review of fee examiner email regarding holdbacks; review of fee order and letter; send copy and e-mail to M. Guitian regarding same.	0.50	195.00	97.50
12/03/19	CE	Finalize and serve GJB Monthly Fee Objection Statement for September 2019; calendar deadline for payment.	0.50	150.00	75.00
12/04/19	JHG	Review billing and payment issue.	0.70	765.00	535.50
12/04/19	MGG	Email to and from Ken Forrest re: Adjustments to fees and expenses per agreement with Fee Examiner.	0.40	575.00	230.00
12/04/19	JA	Review and revise invoices to conform with fee examiner specifications.	2.10	575.00	1,207.50
12/06/19	JA	Review prebills and statements for conformity with fee examiner requirements	1.10	575.00	632.50
12/09/19	JHG	Review proposed litigation budget for January.	0.80	765.00	612.00
12/10/19	CBH	Pull rate increase notices and send to M. Guitian for review (.4); review of paralegal fees in other cases and send copies to M. Guitian (.4).	0.80	195.00	156.00
12/12/19	JHG	Review proposed budget for January.	0.80	765.00	612.00
12/12/19	MGG	Review October prebills and confer with John Arrastia re: same (.30). Detail email to John Arrastia with rate increase analysis (1.0)	1.30	575.00	747.50

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12/12/19	JA	Confer with M. Guitian regarding October prebills.	0.20	575.00	115.00
12/12/19	JA	Confer with M. Guitian re: October prebills.	0.20	575.00	115.00
12/13/19	MGG	Finalize review of October prebills and forward to Ken Forrest for revisions.	1.40	575.00	805.00
12/17/19	MGG	Receipt and review email from accounting with October invoices (.30). Prepare outline and summary of fees (.40).	0.70	575.00	402.50
12/17/19	MGG	Follow up correspondence to Valerie Blay Soler re: payment of September invoices (.30). Prepare, outline and serve October invoices on Committee for review and approval (.60).	0.90	575.00	517.50
12/17/19	CE	Review e-mail correspondence with M. Gutian (.2); Review October invoices and prepare October Monthly Fee Statement with Exhibits (.8).	1.00	150.00	150.00
12/18/19	MGG	Receipt and review email from Valerie Blay Soler and review amounts reflected in Hacienda records for September. (.30). Conference with accounting re: reconciliation of payments (.50). Prepare revised Fee Statement Letter for September and serve on Ms. Blay Soler (.30).	1.10	575.00	632.50
Subtotal: B160 / Fee/Employment Applications			17.80		\$9,404.00
B161 / Budgeting					
12/06/19	JA	Confer with M. Guitian regarding January budget.	0.20	575.00	115.00
12/06/19	MGG	Review Budget prepared by Paul Hastings' and Zolfo Cooper's proposed budgets for the month of January 2020. (.50). Confer with J. Arrastia re: deadline and filing of GJB's January Budget (.20).	0.70	575.00	402.50
12/09/19	JA	Confer with M. Guitian regarding blended fee issue.	0.10	575.00	57.50
12/09/19	MGG	Review and consult on blended rates of attorneys in preparation for January 2020 budget. Emails to and from John Arrastia and Ken Forrest.	0.40	575.00	230.00
12/10/19	JA	Review rate adjustment issues from M. Guitian.	0.10	575.00	57.50
12/10/19	MGG	Receipt and review email from John Arrastia with draft copy of January Budget for review and comment (.40). Email to and from Mr. Arrastia re: paralegal rates and adjustments (.20). Review market and comparable rates of attorneys and paralegals for Promesa cases (.80). Review procedure and form re: Notice of Rate Adjustment (.40).	1.80	575.00	1,035.00
12/11/19	JA	Confirmed analysis of rate adjustment issues from M. Guitian.	0.10	575.00	57.50

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12/11/19	MGG	Continue review and analysis of rates of attorneys in preparation for January 2020 budget. Emails to John Arrastia.	0.80	575.00	460.00
12/13/19	MGG	Review email from Juan Casillas with copy of January 2020 Budget.	0.30	575.00	172.50
12/18/19	MGG	Calculate budget averages per task codes and include prior monthly average and trailing two month averages for Budget (.60). Review and revise January Budget (.40). Email to and from J. Arrastia with comments to January Budget (.60). Consider attorney and paralegal hourly rates and forward to J. Arrastia (.30).	1.90	575.00	1,092.50
12/18/19	JA	Analysis of January budget and fee issues from M. Guitian.	0.20	575.00	115.00
12/26/19	MGG	Review pending items (.30). Email to and from John Arrastia with list of pending items related to GJB Fee Statement and Budget.(.30)	0.60	575.00	345.00
12/27/19	JA	Analyze pending items on fee statement and budget provided by M. Guitian.	0.20	575.00	115.00
Subtotal: B161 / Budgeting			7.40		\$4,255.00
B165 / Fee-Employment Other Professionals					
12/03/19	MGG	Review email José F. Cartaya-Morales's and cover letter and invoices for the services rendered during May, June and July 2019 in the case Commonwealth of Puerto Rico et al Case No. 17-BK3283 (LTS).	0.30	575.00	172.50
12/13/19	JA	Attention to e-discovery vendor statements (.1)	0.10	575.00	57.50
Subtotal: B165 / Fee-Employment Other Professionals			0.40		\$230.00
B181 / Preference Analysis and Recovery Actions					
12/23/19	SS	Prepare digest of matters and filings on December 23 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
Subtotal: B181 / Preference Analysis and Recovery Actions			1.10		\$214.50
B190 / Other Contested Matters					
12/04/19	JA	Reveiw order requiring a short brief regarding continued sealing of information in Motion in Limine (.1)	0.10	575.00	57.50
12/18/19	MGG	Review and confirm calendaring Eighth Revised Order Extending and Establishing Deadlines Applicable to Joint Motion and adjourning certain deadlines and vacating the January 14, 2020 hearing Doc No. 1834 in connection with 9019 Motion (.30). Track status and developments concerning the 9019 Motion (.30).	0.60	575.00	345.00
12/19/19	JA	Confer with FOMB regarding follow up to proposed settlement of CITI (.1); Strategize regarding same (.3)	0.40	575.00	230.00

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12/19/19	CBH	Receipt and review of order extending deadlines for order approving settlements; calendar related deadlines; e-mail correspondence with M. Guitian regarding same.	0.40	195.00	78.00
Subtotal: B190 / Other Contested Matters			1.50		\$710.50
B191 / General Litigation					
12/02/19	JHG	Review second joint status conference regarding sealed information.	0.70	765.00	535.50
12/02/19	JHG	Review email from Alex Bongartz regarding discovery requests from ERS bondholders.	0.50	765.00	382.50
12/02/19	JHG	Review draft responses and objections to bondholders claims.	0.80	765.00	612.00
12/02/19	JHG	Review draft ultra virus interrogatories.	0.80	765.00	612.00
12/02/19	JHG	Review draft response to request to Ultra Vires scope issue discovery.	1.00	765.00	765.00
12/02/19	JHG	Review ECF 9384.	0.80	765.00	612.00
12/02/19	MGG	Review Second Joint Status Report of UCC and Oversight Board and Special Claims Committee re: information filed under seal in connection with Committee's Motion for Order to Pursue Certain Causes of Action [Doc No.9375] (.20). Confirm continued sealing of Genovese Analysis (.20).	0.40	575.00	230.00
12/02/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 743 - 800) (2.9).	6.30	565.00	3,559.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 800 - 888) (3.4).			
12/02/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 34 (28 documents).	3.30	375.00	1,237.50
12/02/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 35 (42 documents).	4.30	375.00	1,612.50
12/02/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 3 (38 documents)	1.80	195.00	351.00
12/03/19	JHG	ERS review and ECF 133 analyze reply of certain secured creditors regarding 926 trustee motion.	1.30	765.00	994.50
12/03/19	JHG	Review ECF 9391 same as 733.	0.50	765.00	382.50
12/03/19	JHG	Review email from Alex Bongartz summarizing ERS bondholders section 552 appeal.	0.60	765.00	459.00

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12/03/19	JHG	Review and analyze Doc 00117520416 in 19-700, First Circuit sur-reply brief regarding bondholders 552(b)(1) claims.	1.30	765.00	994.50
12/03/19	JHG	Review appellants response to sur-reply filed in appeal 19-1700.	0.80	765.00	612.00
12/03/19	JMS	Review issues arising out of motion to dismiss -000361 filed by Certain Defendant.	1.40	500.00	700.00
12/03/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 888 - 898) (.7)	5.30	565.00	2,994.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 899 - 920) (1.3)			
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 921 - 1020) (3.3)			
12/03/19	IRS	Review documents and correspondence regarding settlement discussion relating to the Walmart Adv.	0.40	350.00	140.00
12/03/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 47 (48 Documents).	2.30	465.00	1,069.50
12/03/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 36 (19 documents).	3.10	375.00	1,162.50
12/03/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 37 (39 documents).	3.90	375.00	1,462.50
12/03/19	SS	Review and Analyze documents database documnts produced by Kobre and Klm, Batch SS2, Tranche 4 (45 documents)	1.90	195.00	370.50
12/04/19	JHG	Review and analyze Doc 9391 reply in support of renewed motion of certain secured creditors of ERS (9391); review Doc 9409, Ambac's objection to urgent motion regarding discovery and review stay order issues.	1.10	765.00	841.50
12/04/19	JHG	Review and analysis of email from Alex Bongartz attaching draft limited response regarding mediation.	0.70	765.00	535.50
12/04/19	JMS	Continued attention to issues arising out of motion to dismiss -000361 filed by Certain Defendant (1.4); review Walmart dismissal (.6)	2.00	500.00	1,000.00
12/04/19	JA	Finalize Notice of Dismissal of Walmart Adv. (.1); Straetgize regarding response to Mediator Interim Report and ensure filing of a reservation of rights (.3)	0.40	575.00	230.00
12/04/19	JA	Review Notice of Voluntary Dismissal regarding Walmart Adv. (.1) and implement dismissal process among counsel (.1)	0.20	575.00	115.00

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12/04/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1021 - 1031) (1.1).	3.80	565.00	2,147.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1032 - 1100) (2.7).			
12/04/19	IRS	Prepare draft notice of voluntary dismissal of the Walmart Adv. and prepare correspondence providing same for review.	0.40	350.00	140.00
12/04/19	AMC	Review and analyze declaration furnished by counsel for Walmart (.4), and prepare draft Notice of Dismissal pursuant to Rule 41(a)(1) (.4)).	0.80	375.00	300.00
12/04/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 48 (40 Documents).	3.60	465.00	1,674.00
12/04/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 38 (53 documents).	3.40	375.00	1,275.00
12/04/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 39 (44 documents).	3.80	375.00	1,425.00
12/04/19	JZ	Receipt and review of Notice of Dismissal in the Mangual's Office Cleaning Service adversary; circulate same; update master Defendant excel sheet; update electronic case profile.	0.40	195.00	78.00
12/04/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 5 (43 documents).	1.90	195.00	370.50
12/05/19	JA	Review addendum to tolling agreement (.1); Review FOMB Board Deck regarding unsecured claims (.3); Review update to Committee (.6); Finalize informative motion to attend (.1);	1.10	575.00	632.50
12/05/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1101 - 1207).	4.20	565.00	2,373.00
12/05/19	IRS	Review daily docket entry updates and correspondence regarding informative motion for attendance at December 11 Omnibus Hearing.	0.30	350.00	105.00
12/05/19	IRS	Review final draft notice of voluntary dismissal of Walmart Adv. and correspondence to local counsel regarding same. (.4)	0.70	350.00	245.00
		Confer regarding filing approval of notice of dismissal. (.3)			
12/05/19	AMC	Attend to communications to and from local counsel, Brown Rudnick, and opposing counsel in Adv. Proc. adverse to Walmart.	0.30	375.00	112.50
12/05/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 49 (25 Documents).	3.10	465.00	1,441.50
12/05/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 41 (42 documents).	3.50	375.00	1,312.50

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12/05/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 40 (57 documents).	3.90	375.00	1,462.50
12/05/19	JZ	Receipt and review of Notice of Dismissal in the Casa Grande Interactive Communications adversary; circulate same; update master Defendant excel sheet; update electronic case profile.	0.40	195.00	78.00
12/05/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 6, (36 documents)	1.30	195.00	253.50
12/06/19	JHG	Review issues regarding Walmart dismissal and proposed order.	0.60	765.00	459.00
12/06/19	JHG	Review and analysis of Doc 9496, fourth joint status report.	0.80	765.00	612.00
12/06/19	JHG	Review joint urgent motion, Doc. 9498.	0.60	765.00	459.00
12/06/19	JHG	Review proposed discovery order concerning claim litigation.	0.30	765.00	229.50
12/06/19	JHG	Review email from Alex Bongartz regarding open issues and developments.	0.40	765.00	306.00
12/06/19	JHG	Review and analysis of Doc. 36, joint motion of bondholders to dismiss regarding bondholder claims and amended RSA and pension claims.	2.70	765.00	2,065.50
12/06/19	JMS	Attention to dismissal of Walmart action (.6), review issues relating to Citi claim (1.2)	1.80	500.00	900.00
12/06/19	AMC	Confer with J. Zamora regarding dismissal of Walmart Adversary.	0.10	375.00	37.50
12/06/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 50 (42 Documents).	2.80	465.00	1,302.00
12/06/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 42 (55 documents).	3.60	375.00	1,350.00
12/06/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 43 (61 documents).	3.60	375.00	1,350.00
12/06/19	TG	Download additional data received from O'Melveny, and prepare for processing in Relativity.	0.70	120.00	84.00
12/06/19	JZ	Conference with A. Castaldi regarding dismissal of Walmart adversary (.1); Finalize and file Notice of Dismissal (.3) and circulate same; update master Defendant excel sheet; update electronic case profile (.2).	0.60	195.00	117.00
12/06/19	JZ	Attention to various objections to Interim Report and Recommendation of Mediation Team.	0.40	195.00	78.00
12/06/19	JZ	Revise, finalize and file Motion to Appear at next week's omnibus hearings; update electronic case profile.	0.40	195.00	78.00
12/06/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batchj SS2, Tranche 7 (34 documents)	1.40	195.00	273.00

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12/07/19	SS	Continued Review and Analysis of database documents produced by Kobre and Kim, Batch SS2, Tranche 8 (100 documents)	1.70	195.00	331.50
12/09/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
12/09/19	JHG	Review Doc 9376, certificate of no ERS objection.	0.20	765.00	153.00
12/09/19	JHG	Review Doc 9383, amended informative motion regarding notices of participation and objection to ERS claims.	0.30	765.00	229.50
12/09/19	JHG	Review Doc 9384, informative motion regarding relief from stay.	0.20	765.00	153.00
12/09/19	JHG	Review Doc 9385, order granting extension of deadlines.	0.20	765.00	153.00
12/09/19	JHG	Review Doc 9388, order regarding procedures and participation.	0.20	765.00	153.00
12/09/19	MGG	Review Order by Magistrate Dein Granting Omnibus Motion to Extend Procedures Order Litigation Deadlines Established in the Order Granting Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements, ECF No. 7941 in Case No. 17-3283 and verify calendaring of appropriate deadlines if applicable.	0.20	575.00	115.00
12/09/19	JA	Review agenda for Omnibus Hearing (.3); Review Order extending Deadline for adversary proceedings (.2)	0.50	575.00	287.50
12/09/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1208 - 1241) (1.2).	2.40	565.00	1,356.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1242 - 1275) (1.2).			
12/09/19	IRS	Review Order granting motion to extend response and briefing deadlines for Adversary Proceedings.	0.30	350.00	105.00
12/09/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 51 (37 Documents).	2.40	465.00	1,116.00
12/09/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 52 (43 Documents).	1.90	465.00	883.50
12/09/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 44 (23 documents).	3.20	375.00	1,200.00
12/09/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 45 (45 documents).	3.90	375.00	1,462.50

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12/09/19	JNS	Review Seventh Revised Order scheduling deadlines on the 9019 motion Order [DE 1716], calendar deadlines and circulate calendar entries.	1.10	75.00	82.50
12/09/19	JZ	Receipt and review of Order Granting Omnibus Motion to Extend Deadline Establishing Litigation Case Management Procedures in the vendor adversary cases; circulate same; calendar deadlines and update electronic case profile.	0.40	195.00	78.00
12/09/19	SS	Review and Analyzed database documents produced by Kobre and Kim, Batch SS2, Tranche 9 (48 documents)	1.20	195.00	234.00
12/10/19	JHG	Review S. Siff daily summary to identify and analyze strategic litigation issues.	0.80	765.00	612.00
12/10/19	JHG	Review ECF 9391 reply to motion to appoint trustee to pursue claims.	0.90	765.00	688.50
12/10/19	JHG	Review ECF 1794, urgent motion to file under seal.	0.30	765.00	229.50
12/10/19	JHG	Review ECF 733 ERS regarding appointment of trustee and cited case law.	3.10	765.00	2,371.50
12/10/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1276 - 1343) (2.6).	5.30	565.00	2,994.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1344 - 1413) (2.7).			
12/10/19	IRS	Review extensive docket entry updates from S. Siff and case management orders related to 19-388. (.6)	0.60	350.00	210.00
12/10/19	AMC	Analyze and review pending matters on agenda of December 11 hearing.	0.30	375.00	112.50
12/10/19	AMC	Reviewed and analyzed Notice of Agenda of Scheduled Matters [DE 9519].	0.20	375.00	75.00
12/10/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 53 (53 Documents).	2.90	465.00	1,348.50
12/10/19	JZ	Receipt and review of Notice of Agenda of Scheduled Matters [ECF No. 9519].	0.20	195.00	39.00
12/10/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.30	195.00	58.50
12/10/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 10 (68 documents).	1.80	195.00	351.00
12/11/19	JHG	Review email regarding Judge Swain ruling on San Juan debt adjustment.	0.90	765.00	688.50
12/11/19	JMS	Attention to issues arising from omnibus hearing and litigation strategy.	2.20	500.00	1,100.00

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12/11/19	MGG	Review Response and Objection of Individual Bondholder to Interim Report and Recommendation of Mediation Team (.30). Review Doc No. 9415 Order, entered in connection with the Marrero Plaintiffs' Motion to intervene in Adversary Proceeding 19-00388; (.10); Review Doc No. 9418 UCC's Urgent Motion to File Under Seal its Reply in Support of Motion In Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation (.10). Review Doc No. 9480 UCC's Motion In Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation (Docket Entry No. 9258 in Case No. 17-3283 and Docket Entry No. 1752 in Case No. 17-4780) (.20).	0.70	575.00	402.50
12/11/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1414 - 1500) (2.4). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1501 - 1549) (2.2).	4.60	565.00	2,599.00
12/11/19	IRS	Review daily docket entry updates from S. Siff.	0.30	350.00	105.00
12/11/19	AMC	Received and analyzed response and opposition to recommendation of mediation team filed by creditor [ECF No. 9508].	0.40	375.00	150.00
12/11/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 54 (38 Documents).	2.20	465.00	1,023.00
12/11/19	JZ	Receipt and review of Minute Order reflecting the matters heard by the Court at today's Omnibus hearing; update electronic case profile.	0.20	195.00	39.00
12/11/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.40	195.00	78.00
12/11/19	JZ	Attention to deadline and tolling agreement with URS Engineers.	0.20	195.00	39.00
12/11/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranch11 (53 documents)	1.60	195.00	312.00
12/12/19	JHG	Review ECF 9544 informative motion.	0.20	765.00	153.00
12/12/19	JHG	Brief review of 30 objections to claims, ECFs 9546-9576.	0.60	765.00	459.00
12/12/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic issues.	0.90	765.00	688.50
12/12/19	JHG	Review ECF 9534, stay relief motion.	0.40	765.00	306.00
12/12/19	JHG	Review ECF 9535 motion for relief from stay.	0.30	765.00	229.50

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12/12/19	JHG	Review ECF 9537 and appeal issues.	0.30	765.00	229.50
12/12/19	JA	Review correspondence from counsel regarding service of process in AP-280 (.1);	0.10	575.00	57.50
12/12/19	JA	Review recommendations for dismissal of garden avoidance actions (.3)	0.30	575.00	172.50
12/12/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1550 - 1600) (3.3).	4.90	565.00	2,768.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1601 - 1627) (1.6).			
12/12/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 55 (48 Documents).	3.30	465.00	1,534.50
12/12/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 46 (17 documents).	3.40	375.00	1,275.00
12/12/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 47 (30 documents).	3.30	375.00	1,237.50
12/12/19	JZ	Receipt and review of Motion for Re-Issuance of Summons and /or Authorization of Service by Publication in certain adversary cases; cross reference the adversary cases cited in motion with our internal list; update electronic case profile.	0.40	195.00	78.00
12/12/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.40	195.00	78.00
12/12/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranch 12 (41 Documents)	0.80	195.00	156.00
12/13/19	JHG	Review daily email summary from S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
12/13/19	JHG	Review ECF 9545, proposed order and motion regarding relief from automatic stay.	0.40	765.00	306.00
12/13/19	JHG	Review ECF 9545 urgent omnibus motion regarding reissuance of summons.	0.60	765.00	459.00
12/13/19	JHG	Review ECF 1822 in Adv. 17-04780 regarding motion to seal and supplemental briefing.	0.40	765.00	306.00
12/13/19	JHG	Review ECF 9579 informative motion regarding objection to bondholder claims.	0.40	765.00	306.00
12/13/19	JHG	Review daily summary by S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
12/13/19	JHG	Review ECF 1818 in 17-04780, unopposed urgent motion and motion.	0.60	765.00	459.00
12/13/19	JHG	Review additional daily summary from S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00

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12/13/19	JHG	Review response of Assured Guaranty to interim report of mediation team and analyze issues.	1.40	765.00	1,071.00
12/13/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1628 - 1710) (4.3).	4.30	565.00	2,429.50
12/13/19	IRS	Review multiple docket entry updates from S. Siff.	0.60	350.00	210.00
12/13/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 56 (41 Documents).	3.10	465.00	1,441.50
12/13/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 48 (31 documents).	3.70	375.00	1,387.50
12/13/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.30	195.00	58.50
12/13/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.20	195.00	39.00
12/13/19	SS	Review and Analyze database documents produced by Kobre and Kim, batch SS2, Tranche 13 (65 documents)	2.10	195.00	409.50
12/13/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 18 (26 documents).	0.80	195.00	156.00
12/16/19	JHG	Review S. Siff daily summary and identify and analyze strategic litigation issues.	0.80	765.00	612.00
12/16/19	JHG	Review ECF 9591, informative motion and analyze issues regarding agreement to lift stay.	0.70	765.00	535.50
12/16/19	JHG	Review order to show cause ECF 9594 and exercise issue regarding return of service.	0.40	765.00	306.00
12/16/19	JHG	Review ECF 1826, order on motion to exceed page limit regarding fuel line lenders with UCC and related issues.	0.70	765.00	535.50
12/16/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1711- 1771) (2.7).	4.80	565.00	2,712.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1772 - 1834) (2.1).			
12/16/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 57 (51 Documents).	2.60	465.00	1,209.00
12/16/19	JZ	Assist in revising or obtaining information regarding the OZ affiliated entities in the Challenge Bond adversaries; numerous conferences with A. Castaldi regarding same.	1.20	195.00	234.00
12/16/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.20	195.00	39.00

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12/16/19	JZ	Receipt and review of Order to Show Cause regarding Urgent Omnibus Motion for Re-Issuance of Summons and/or Authorization of Service; e-mails from and to J. Arrastia and S. Siff to determine our involvement; update electronic case profile.	0.30	195.00	58.50
12/16/19	SS	Reviewed and Analyzed database documents produced by Kobre and Kim, Batch SS2, Tranche 14 (37 documents	1.20	195.00	234.00
12/17/19	JHG	Review first daily summary from S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
12/17/19	JHG	Review ECF 9595, omnibus order on stay relief.	0.40	765.00	306.00
12/17/19	JHG	Review ECF 9597, motion to exceed page limits in RSA related issues.	0.30	765.00	229.50
12/17/19	JHG	Review ECF 23 in 19-00288, third notice of voluntary dismissal.	0.30	765.00	229.50
12/17/19	JHG	Review ECF 9597 PREPA regarding extension and RSA.	0.40	765.00	306.00
12/17/19	JHG	Review ECF 9598, Fuel line lenders limited reply.	0.40	765.00	306.00
12/17/19	JHG	Review UCC filing ECF 1831 reply brief and limited relief.	0.40	765.00	306.00
12/17/19	JHG	PREPA review voluntary dismissals of defendants in 19-0036 and original complaint.	0.40	765.00	306.00
12/17/19	MGG	Track the voluntary dismissal of Defendants in ECF 44 AP19-00361: ECF 23 AP 19-00288; and ECF 52 AP 19-00283.	0.40	575.00	230.00
12/17/19	AMC	Review of mediation team's interim report [ECF 9365] (.4) and review of responses/objections thereto (.7)	1.10	375.00	412.50
12/17/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 58 (42 Documents).	2.20	465.00	1,023.00
12/17/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 49 (27 documents).	3.40	375.00	1,275.00
12/17/19	JZ	Receipt and review of Response of the FOMB and Citigroup Capital Markets Inc's Response to Court Order Granting Motion to Seal for Limited Duration relating to the UCC's Motion in Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement; update electronic case profile.	0.30	195.00	58.50
12/17/19	JZ	Review of internal memo circulated by S. Siff and conform docketing.	0.40	195.00	78.00
12/17/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to: Intl FCStone Financial Inc. and Sterne, Agee & Leach, Inc in ADV 19-357; circulate same; update master defendant excel sheet; update electronic case profile.	0.40	195.00	78.00

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12/17/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to Vanguard Corporation in ADV 19-356; circulate same; update master defendant excel sheet; update electronic case profile.	0.30	195.00	58.50
12/17/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to Defendant 21K and 50W in ADV 19-282; circulate same; update master defendant excel sheet; update electronic case profile.	0.40	195.00	78.00
12/17/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to Intl FCStone Financial Inc. and Defendant 42L in ADV 19-283; circulate same; update master defendant excel sheet; update electronic case profile.	0.40	195.00	78.00
12/17/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to Defendants 1D, 40D, and 57D in ADV 19-288; circulate same; update master defendant excel sheet; update electronic case profile.	0.40	195.00	78.00
12/17/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to Defendant 38G in ADV 19-361; circulate same; update master defendant excel sheet; update electronic case profile.	0.30	195.00	58.50
12/17/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Trnche 15 (35 documents)	1.40	195.00	273.00
12/18/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
12/18/19	JHG	Review Fuel line lenders limited reply regarding deadlines and hearing date.	0.40	765.00	306.00
12/18/19	JHG	Review UCC reply regarding extension ECF 9599.	0.50	765.00	382.50
12/18/19	JHG	Review ECF 1832 in Case No. 17-04780 reply regarding adjournment of deadlines.	0.60	765.00	459.00
12/18/19	JHG	Review ECF 9608 and 1836 motion of PREPA and AAFAF and review changed deadlines for objection, designation and motions in limine.	1.10	765.00	841.50
12/18/19	JHG	Review ECF 1834 eighth revised order.	0.40	765.00	306.00
12/18/19	JHG	Review ECF 9617 notice of presentment of proposed order.	0.30	765.00	229.50
12/18/19	JHG	Review ECF 9615 amended joint stipulation.	0.60	765.00	459.00
12/18/19	JA	Review correspondence regarding due diligence supporting dismissal recommendations relating to garden variety avoidance actions	0.20	575.00	57.50

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12/18/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1835- 1928) (3.6).	4.40	565.00	2,486.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1929 - 1911) (.8).			
12/18/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 59 (6 Documents).	1.30	465.00	604.50
12/18/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 60 (37 Documents).	2.40	465.00	1,116.00
12/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 50 (46 documents).	3.90	375.00	1,462.50
12/18/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 51 (38 documents).	3.60	375.00	1,350.00
12/18/19	JNS	Update Tolling Agreements deadlines chart, prepare and circulate calendar entries for same (Addendum to Tolling Agreement between Financial Oversight and Management Board and Shell Tarding (US) Company)	0.30	75.00	22.50
12/18/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.20	195.00	39.00
12/18/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 16 (26 documents)	1.20	195.00	234.00
12/19/19	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
12/19/19	JHG	Review ECF 9612 and 9613 regarding relief from stay and notice.	0.30	765.00	229.50
12/19/19	JHG	Review ECF 661 in Case 17-03567 amended joint stipulation and memorandum regarding relief from the automatic stay.	0.50	765.00	382.50
12/19/19	JHG	Review ECF 9608 eighth revised order regarding deadlines.	0.40	765.00	306.00
12/19/19	MGG	Review DOC No. 9619 Interim Case Management Order and verify procedures and deadlines going forward and impact on GJB pending litigation (.40). Review DOC No. 9620 Interim Case Management Order for Revenue Bonds and impact on GJB pending litigation (.30).	0.70	575.00	402.50
12/19/19	JMS	Strategize with J. Arrastia regarding mediation and case management issues relating to litigation strategy.	1.10	500.00	550.00
12/19/19	JA	Review Order Addressing the Filing of an Amended Report by the Mediation Team (.3); Review and analyze Amended Case Management Order (1.1); Reveiw and analyze Interim Case Management Order for Revenue Bonds (.8); reveiw and analyze due diligence materials supporting vendor action dismissals (.6) and strategize with Jesus Suarez (1.1)	3.10	575.00	1,782.50

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12/19/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1941- 1976) (2.8).	4.40	565.00	2,486.00
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 1977 - 2074) (2.6).			
12/19/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 61 (35 Documents).	3.90	465.00	1,813.50
12/19/19	AMC	Reviewed and analyzed Order of the Court addressing the filing of an amended report by the mediation team [DE 9618]	0.60	375.00	225.00
12/19/19	AMC	Reviewed and analyzed order extending and establishing certain deadlines [DE 9608]	0.30	375.00	112.50
12/19/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 52 (51 documents).	3.30	375.00	1,237.50
12/19/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 53 (39 documents).	2.80	375.00	1,050.00
12/19/19	JZ	Receipt and review of Order Addressing Filing of Amended Report by Mediation Team and Extending Deadlines and Stay Period in adversary cases 19-280, 19-283, 19-364, 19-288, 19-360, 19-357, 19-282, 19-355, 19-361, 19-367; 19-356, 19-297, 19-359; calendar hearing date and multiple deadlines; e-mails to and from A. Castaldi and S. Siff regarding order; update electronic case profile for each case.	0.80	195.00	156.00
12/19/19	JZ	Receipt and review of Interim Case Management Order in Case No. 19-280, 19-281, 19-282, 19-283, 19-288 and 19-297; calendar the numerous deadlines based on case type and hearing dates contained in order; circulate same; update electronic case profile on each matter.	0.80	195.00	156.00
12/19/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.40	195.00	78.00
12/19/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 17 (21 documents)	1.20	195.00	234.00
12/20/19	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.30	765.00	229.50
12/20/19	JHG	Review ECF 9634 regarding relief from stay.	0.20	765.00	153.00
12/20/19	JA	Review and analysis of correspondence from Government Parties regarding objections, counter-designations and streatgize regarding same (1.2)	1.20	575.00	690.00
12/20/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 2075 - 2151).	4.30	565.00	2,429.50
12/20/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 62 (14 Documents).	2.20	465.00	1,023.00

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12/20/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 54 (62 documents).	3.60	375.00	1,350.00
12/20/19	JZ	Review of report circulated by S. Siff and conform docketing.	0.20	195.00	39.00
12/20/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 18 (26 documents)	1.10	195.00	214.50
12/22/19	JA	Strategize regarding stayed actions, complaint amendments, and other pending procedural and strategic considerations (1.6)	1.60	575.00	920.00
12/23/19	JHG	Review email from Alex Bongartz and analyze attached motion, ECF 9638 regarding extension for amended mediation report and proposed order.	1.40	765.00	1,071.00
12/23/19	JHG	Review draft proposed statement regarding mediation.	0.80	765.00	612.00
12/23/19	JHG	Review draft additional omnibus objection.	0.90	765.00	688.50
12/23/19	JHG	Review ECF DBA motion of time for removal of cases.	0.50	765.00	382.50
12/23/19	MGG	Review Doc No. 9638 Motion of Mediation Team seeking an Order (i) extending the deadline for submission of the Amended Report through February 10, 2020, (ii) extending the deadline for the filing of responses in support of, or objections to, the Amended Report through February 21, 2020, (iii) setting a hearing to consider the Amended Report and responses/objections thereto for March 4, 2020 at 9:30 a.m. (iv) directing that parties who filed responses to the Interim Report meet and confer following submission of the Amended Report, and (v) directing that the deadlines and other requirements of the Interim Orders remain in effect and be complied with pending the March 4, 2020 hearing (.30). Track impact on pending litigation (.20). Review Doc No. 9639 the Court's Order granting the Mediation Team's Motion to Enlarge Time (ECF 9638) and entry of new deadlines (.20).	0.70	575.00	402.50
12/23/19	JA	Confer with co-counsel regarding publication mandated by ECF9619 (.1)	0.00	575.00	0.00
12/23/19	JMS	Review issues arising from CitiBank participation in 2014 GO Bond offering and potential amendment of Adversary Claims.	2.30	500.00	1,150.00
12/23/19	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 2152 - 2191) (2.3).	5.90	565.00	3,333.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 2192 - 2294).(3.6)			
12/23/19	IRS	Review extensive orders and docket entry updates, and review internal correspondence regarding application of orders to GJB-involved matters.	1.50	350.00	525.00

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12/23/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 63 (42 Documents).	2.30	465.00	1,069.50
12/23/19	AMC	Review of Orders of the Honorable Judge Swain concerning amended mediation status report enter	1.80	375.00	675.00
12/23/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 55 (56 documents).	3.90	375.00	1,462.50
12/23/19	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 56 (39 documents).	3.60	375.00	1,350.00
12/23/19	JZ	Receipt and review of Amended Order Addressing Filing of Amended Report by Mediation Team and Extending Deadlines and Stay Period in adversary cases 19-280, 19-283, 19-364, 19-288, 19-360, 19-357, 19-282, 19-355, 19-361, 19-367; 19-356, 19-297, 19-359;; calendar new hearing date and multiple deadlines; e-mails to S. Siff regarding order; update electronic case profile for each case.	0.80	195.00	156.00
12/23/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 19 (19 documents).	0.80	195.00	156.00
12/23/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 20 (20 documents)	0.80	195.00	156.00
12/24/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.20	195.00	39.00
12/24/19	JZ	Receipt and review of Mediation Team's Urgent Motion for Extension of Time to File Amended Report; update electronic case profile.	0.30	195.00	58.50
12/24/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 20 (17 documents)	0.80	195.00	156.00
12/26/19	JA	Confer with Nick Bassett to confirm service of materials pursuant to court order (ECF 9619) (.1)	0.10	575.00	57.50
12/26/19	IRS	Review recent orders and docket entries and correspondence regarding their effect on all GJB-involved proceedings.	1.30	350.00	455.00
12/26/19	JZ	Attention to internal report circulated by S. Siff and conform docketing.	0.40	195.00	78.00
12/26/19	JZ	Receipt and review of Order Partially Amending Order Addressing Filing of Amended Report by Mediation Team and Extending Deadlines and Stay Period in adversary cases 19-280, 19-283, 19-364, 19-288, 19-360, 19-357, 19-282, 19-355, 19-361, 19-367; 19-356, 19-297, 19-359; calendar hearing date and multiple deadlines; update electronic case profile for each case.	0.70	195.00	136.50
12/26/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 20, (27 documents).	1.20	195.00	234.00
12/27/19	JA	Reveiwl Joint Statement of Adversary Defendants re 9657 (.1); Review Motion to delay the hearing on the 9019 hearing (ECF 9659)(.3); Review Court Order regarding Amended Mediation Report [ECF 9661](.3)	0.70	575.00	402.50

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12/27/19	MGG	Review and track pleadings in connection with Mediation Team's Urgent Motion for Extension of Filing Deadline for Mediation Team Amended Report [Doc No. 9638] and impact on pending litigation including (i) UCC's Position Statement (.30); (ii) joint Statement of Certain Adversary Defendants in opposition of the Further Extension of the Global Stay; (iii) the DRA Parties' Restated Reservation of Rights with Respect to the Amended Interim Report and Recommendation of the Mediation Team; and (iv) Doc No. 9661 Court's Amended and Restated Order.	0.60	575.00	345.00
12/27/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF1, Tranche 64 (43 Documents).	3.30	465.00	1,534.50
12/27/19	IRS	Review Amended Order addressing the filing of an Amended Report by the Mediation Team and Extending the Stay Period. (.3)	0.80	350.00	280.00
		Review recent magistrate orders regarding Clawback and GO Bond claim objections. (.2)			
		Review daily docket entry updates by S. Siff. (.3)			
12/27/19	AMC	Reviewed and analyzed the Court's amended and restated Order concerning filing of amended mediation team report [DE 9661]	0.30	375.00	112.50
12/27/19	JZ	Receipt and review of Amended and Restated Order Partially Amending Order Addressing Filing of Amended Report by Mediation Team and Extending Deadlines and Stay Period in adversary cases 19-280, 19-283, 19-364, 19-288, 19-360, 19-357, 19-282, 19-355, 19-361, 19-367; 19-356, 19-297, 19-359; calendar hearing date and multiple deadlines; update electronic case profile for each case.	0.70	195.00	136.50
12/27/19	JZ	Attention to internal report circulated by S. Siff.	0.30	195.00	58.50
12/27/19	SS	Review and Analyze database documents produced by Kobre amd Kim, Batch SS2, Tranche 21 (24 documents)	1.10	195.00	214.50
12/30/19	JHG	Review email from S. Siff attaching filings.	0.30	765.00	229.50
12/30/19	JHG	Review ECF 9663 regarding scheduling of briefing.	0.30	765.00	229.50
12/30/19	JHG	Review motion for relief from stay regarding eminent domain (ECF 9664).	0.40	765.00	306.00
12/30/19	JHG	Review ECF Doc. 9666 regarding relief from stay.	0.30	765.00	229.50
12/30/19	JA	Reveiw Court Orders ECF 9663 and ECF 1846 (.1)	0.10	575.00	57.50
12/30/19	JMS	Review issues concerning litigation stay and impact on underwriter claims.	2.30	500.00	1,150.00

PROMESA - Official Committee of Unsecured Creditors
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12/30/19	JAF	Reviewed Kobre and Kim database documents in Batch JAF2, Tranche 1 (52 Documents).	2.90	465.00	1,348.50
12/30/19	IRS	Review docket entry updates and recent Order summaries from S. Siff.	0.40	350.00	140.00
12/30/19	JZ	Attention to internal report circulated by S. Siff.	0.40	195.00	78.00
12/30/19	JZ	Receipt and review of executed tolling agreement with Petrowest; calendar new termination date; update electronic case profile.	0.40	195.00	78.00
12/30/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 22 (38 document)	1.80	195.00	351.00
12/31/19	JZ	Attention to internal report circulated by S. Siff.	0.30	195.00	58.50
12/31/19	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 23 (37 documents)	1.80	195.00	351.00
Subtotal: B191 / General Litigation			339.80		\$158,573.50
B320 / Plan and Disclosure Statement					
12/02/19	MGG	Review and prepare outline of proposed Commonwealth Plan of Adjustment and treatment of Bondholders (1.0). Consider impact on pending litigation (.50). Email to J.Suarez and J. Arrastia. (.20).	1.70	575.00	977.50
12/02/19	JA	Review email from M. Guitian re: analysis of Plan of Adjustment.	0.60	575.00	345.00
Subtotal: B320 / Plan and Disclosure Statement			2.30		\$1,322.50
Total			469.10		\$196,535.50

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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	56.30	765.00	43,069.50
JMS	Jesus M Suarez	Partner	13.10	500.00	6,550.00
ALG	Alfredo L Gonzalez	Partner	64.90	565.00	36,668.50
MGG	Mariaelena Gayo-Guitian	Partner	21.20	575.00	12,190.00
JA	John Arrastia	Partner	16.90	575.00	9,660.00
IRS	Irina R Sadovnic	Associate	8.30	350.00	2,905.00
JPB	JP Bado	Associate	82.00	375.00	30,750.00
AMC	Angelo M Castaldi	Associate	6.20	375.00	2,325.00
JAF	Juan A Fernandez-Barquin	Associate	50.70	465.00	23,575.50
JNS	Jessey N Sardina	Paralegal	1.40	75.00	105.00
TG	Tricia Garcia-Montes	Paralegal	0.70	120.00	84.00
CE	Carolyn Esser	Paralegal	2.00	150.00	300.00
CBH	Colleen B Hopkins	Paralegal	1.70	195.00	331.50
SS	Steve Siff	Paralegal	126.80	195.00	24,726.00
JZ	Johana Zamora	Paralegal	16.90	195.00	3,295.50
Total			469.10		\$196,535.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	222.20
	Pacer - Online Research	690.30
12/31/2019	Data management and hosting (12272-001) Trustpoint.One 19-08803	7,278.93

Total Costs incurrent and advanced

\$8,191.43

Current Fees and Costs

\$204,726.93

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020
Please Refer to
Invoice Number: 96954

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Dec 31, 2019	42,682.25
Costs incurred and advanced	1,057.26
Current Fees and Costs Due	43,739.51

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Dec 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
12/03/19	JZ	Attention to deadline management; circulate e-mail with upcoming deadlines.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			0.40		\$78.00
B160 / Fee/Employment Applications					
12/12/19	MGG	Review October prebills.	0.60	575.00	345.00
Subtotal: B160 / Fee/Employment Applications			0.60		\$345.00
B161 / Budgeting					
12/18/19	JA	Additions revisions to budget and submit final to committee with cover letter	0.40	575.00	230.00
Subtotal: B161 / Budgeting			0.40		\$230.00
B190 / Other Contested Matters					
12/01/19	JA	Analyze government parties' Response to Motion in Limine as to Chapados, strategize, and review transcript of deposition for rebuttal points and prepare email memorandum regarding strategic argument points.	2.10	575.00	1,207.50
12/03/19	JA	Revise Reply to Motion to Exclude Chapados Testimony (1.3); review Motion to File under seal (.2)	1.50	575.00	862.50
12/04/19	JA	Review Order Requiring Justification for Sealing Motion in Limine [DE 1798].	0.10	575.00	57.50
12/06/19	AMC	Reviewed and analyzed PREPA RSA and supporting Rile 9019 Motion, with particular reference to proposed claim resolution procedures and post-confirmation trust(s).	1.60	375.00	600.00
12/10/19	ARD	Reviewed original 9019 motion, supplemental order, amended complaint and litigation issues.	2.80	625.00	1,750.00
12/16/19	JA	Reveiw Motion to Extend Deadline with respect to PREPA RSA 9019.	0.20	575.00	115.00
12/16/19	MGG	Receipt and review Urgent Unopposed Motion filed by Government requesting court to vacate the January 14, 2020 hearing on the PREPA 9019 Motion and extend deadlines Doc No. 1824. (.30).	0.30	575.00	172.50
12/16/19	MGG	Review docket on PREPA 9019 Motions and objections filed in connection therewith.	0.70	575.00	402.50
12/16/19	JZ	Attention to responses filed to the 9019 motion.	0.40	195.00	78.00

12/16/19	JZ	Receipt and review of Urgent Unopposed Motion of Government Parties for Eighth Revised Order Extending and Establishing Certain Deadlines Applicable to the 90109 motion and the Order Setting Briefing Schedule on same; calendar response and reply deadline; update electronic case profile.	0.40	195.00	78.00
12/17/19	MGG	Review and track pleadings Doc. Nos. 1830, 1831, 1832 and 1833 filed in connection with 9019 Motion.	0.50	575.00	287.50
12/19/19	MGG	Review article from Reorg Research concerning legislative position re: approval of the PREPA RSA.	0.30	575.00	172.50
12/19/19	MGG	Track and review docket for pleadings related to 9019 Motion (i) Joinder of the Bondholder Parties to the Government Parties' Deposition Counter-Designations and Objections to Proposed Exhibits Listed by the 9019 Objectors, and Identification of Witnesses to be Cross-Examined, in Connection with the Hearing on Joint Motion of Puerto Rico Electric Power Authority and AAFAF Pursuant to Bankruptcy Rules 3012(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement (ii) PREPA Bond Trustee's reservation of rights regarding the identification of witnesses to be cross-examined at the 9019 Hearing.	0.50	575.00	287.50
Subtotal: B190 / Other Contested Matters			11.40		\$6,071.00
B191 / General Litigation					
12/02/19	JHG	Review email from Rosa Sierra regarding extension PREPA.	0.20	765.00	153.00
12/02/19	JA	Strategize with J. Zamora regarding Motions to Stay/Intervene.	0.30	575.00	172.50
12/02/19	JA	Review tolling agreements for execution (.6); Attention to additional tolling agreement and issues (.4); Review proposed Motion to Exceed Page Limit (.2); Confer with opposing counsel (.2); Outline materials for preparation for hearing on Motion to Stay (.4)	1.80	575.00	1,035.00
12/02/19	JMS	Attention to extension of tolling agreements and inclusion of committee as a party to same.	1.60	500.00	800.00
12/02/19	JZ	Conference with J. Arrastia regarding pending motions to stay/intervene in the Fuel Oil adversary (.3); commence retrieving filed motions, answers and replies thereto (1.7); commence retrieving and indexing case law cited in said court filings (1.1)	3.10	195.00	585.00
12/03/19	JHG	Review PREPA ECF 9393 UCC reply to motion in limine regarding lay opinion.	0.70	765.00	535.50
12/03/19	JA	Confer with J. Zamora regarding objections to mediator's report.	0.20	575.00	115.00
12/03/19	MGG	Review Doc No. 9393 Committee's reply in support of the motion to exclude the testimony of Mr. Chapados in	0.40	575.00	230.00

		connection with the PREPA 9019 motion. Monitor 9019 matters.			
12/03/19	JA	Receive Motion to Set Motion to Intervene for hearing (.2); research case file regarding Motion to Intervene (.3) and strategize regarding same (.3); email correspondence to co-plaintiff counsel, May Orenstein (.1); review court order on Motion to Exceed Page Limits (.1); review procedures order (.1); Review materials in preparation for oral argument on Motion to Stay and strategize regarding argument (1.3)	2.40	575.00	1,380.00
12/03/19	JZ	E-mails to and from J. Arrastia regarding filing of objection to mediator's report.	0.20	195.00	39.00
12/03/19	JZ	Receipt and review of Order regarding procedure for attendance at the December 11th omnibus hearing; update electronic case profile.	0.20	195.00	39.00
12/03/19	JZ	Receipt and review of SCC's Omnibus Reply in Support of Motion to Stay; receipt and review of Order granting same; update electronic case profile.	0.40	195.00	78.00
12/03/19	JZ	Receipt and review of the Marrero Plaintiff's Motion requesting the Motion to Intervene to be heard at the December 11th omnibus hearings; circulate same; e-mails to and from J. Arrastia regarding previously entered briefing order addressing the Motion to Intervene; update electronic case profile.	0.30	195.00	58.50
12/04/19	JA	Confer with SCC counsel regarding Notice of Hearing as to Marrero investors (.1); receive and review Order regarding Motion to Inform Relating to Marrero Plaintiffs Request for Hearing [DE 55] (.1); review SCC Reply to Opposition to Motion to Dismiss (.8)	1.00	575.00	575.00
12/04/19	JZ	Receipt of Order on UCC's Urgent Motion to File Under Seal its Reply in Support of Motion In Limine to Strike and Exclude Improper Lay Opinion Testimony of Frederic Chapados Regarding Alleged Effect of 9019 Settlement on PREPA Transformation; calendar deadline to file short brief justifying the continued sealing; update electronic case profile.	0.30	195.00	58.50
12/04/19	JNS	Prepare hearing notebooks for the hearing on the Motion to Stay Adversary Proceeding. Review Motion to Stay, responses and reply and research the caselaw cited in each. download, print and prepare working binder containing all cases in alphabetical order.	5.20	75.00	390.00
12/04/19	JZ	Receipt and review of SCC's Omnibus Reply to Motion to Stay Adversary in the Fuel Oil adversary; circulate same; update electronic case profile.	0.40	195.00	78.00
12/04/19	JZ	Finalize oral argument materials, including case law stated in pending motions to stay/intervene in the Fuel Oil adversary	0.80	195.00	156.00
12/04/19	JNS	Download, review and calendar deadlines in the SEVENTH REVISED ORDER EXTENDING AND ESTABLISHING CERTAIN DEADLINES APPLICABLE TO	0.80	75.00	60.00

THE JOINT MOTION OF PUERTO RICO ELECTRIC POWER AUTHORITY AND AAFAF PURSUANT TO BANKRUPTCY CODE SECTIONS 362, 502, 922, AND 928, AND BANKRUPTCY RULES 3012(A)(1) AND 9019 FOR ORDER APPROVING SETTLEMENTS EMBODIED IN THE RESTRUCTURING SUPPORT AGREEMENT [ECF NO. 1235]

12/05/19	JA	Confer with counsel for Special Claims Committee regarding Tolling Agreement (.2); Analyze materials submitted by other parties affected by FOMB Motion to Stay and analyze responses, strategize, and re-review legal authority cited in memoranda and outline arguments (2.1)	2.30	575.00	1,322.50
12/05/19	JMS	Continued review of issues with tolling agreements and incorporation of the committee to same.	1.20	500.00	600.00
12/05/19	AMC	Continued analysis of claims asserting by Vitol against co-plaintiff, the Oversight Board in Vitol's answer and counterclaims	1.40	375.00	525.00
12/05/19	IRS	Review draft PREPA tolling agreement addendum.	0.30	350.00	105.00
12/05/19	JNS	Prepare Draft Informative Motion to attend the hearing on December 11-12	0.30	75.00	22.50
12/06/19	JA	Confer with counsel for Vitol regarding oral argument on Motion to Stay (.2); Continued preparation of oral argument on Special Claims Committee's Motion to Stay, including review of arguments and legal authority and Vitol opposition and Marerro Plaintiff's filing (2.8); Confer with counsel for SCC regarding its compromise of requested stay to time certain and strategy regarding same (.6); Prepare communication to Committee (.4); Confer with Special Claims Committee counsel (.1)	4.10	575.00	2,357.50
12/06/19	JMS	Attention to briefing and other issues related to potential stay (1.6); review issues related to execution of tolling agreements (.6)	2.20	500.00	1,100.00
12/06/19	AMC	Analyze/discuss litigation strategy concerning upcoming Omnibus hearing.	0.70	375.00	262.50
12/06/19	AMC	Assist with preparation for argument at Omnibus hearing.	0.70	375.00	262.50
12/06/19	AMC	Research of First Circuit and other federal authorities concerning appellate issues and prepare brief memorandum summarizing said research.	4.20	375.00	1,575.00
12/09/19	JA	Various telephone calls and emails with May Orenstein of Special Claims Committee throughout the day regarding stay request (.6); confer with counsel for Vitol regarding stay request (.4); Review correspondence from additional defendants regarding stay issues (.2); review and comment on proposed Interim Order (.2)	1.40	575.00	805.00
12/09/19	JZ	Attention to deadline management; circulate e-mails regarding expiration of tolling agreement.	0.30	195.00	58.50

12/10/19	JHG	Review and analysis of UCC committee reply in support of motion in limine (ECF 9393), review issues regarding PREPA removal of cases.	0.40	765.00	306.00
12/10/19	JHG	Review ECF 9395, urgent motion to seal regarding lay opinion.	0.50	765.00	382.50
12/10/19	JHG	Review and analysis of ECF 1793 UCC reply in support of motion in limine.	1.10	765.00	841.50
12/10/19	MGG	Review and track PREPA filings Doc Nos. 1793 /1794 in connection with the UCC's Motion in Limine to Strike and Exclude Lay Opinion of Frederic Chapados and litigation pending in adv. case 19-00388 Motion to Stay Proceedings Doc No. 62.	0.40	575.00	230.00
12/10/19	JMS	Attention to tolled party issues (1.9), litigation stay issues (1.9).	2.80	500.00	1,400.00
12/10/19	AMC	Reviewed and analyzed addendum to tolling agreement involving tolled putative defendant.	0.40	375.00	150.00
12/10/19	AMC	Review of notice of hearing filed by Marrero Plaintiffs and analyze the Hon. Judge Dein's prior text order concerning Marrero Plaintiff's Motion to Intervene.	0.30	375.00	112.50
12/10/19	AMC	Preliminary review of Omnibus Objection [DE 9409] filed by Cobra Acquisition as to administrative expenses of professionals.	0.60	375.00	225.00
12/10/19	AMC	Review and analyze informative motion filed by FOMB concerning FOMB's Motion to Stay Adv. Proc. No. 19-388, and proposed order thereto.	0.40	375.00	150.00
12/10/19	AMC	Began review and analyze RSA filed by FOMB in conjunction with Rule 9019 with specific reference to putative effects on PREPA adversary proceedings.	0.60	375.00	225.00
12/10/19	AMC	Reviewed and analyzed Order granting in part Motion to Stay Adv. Proc. 19-388, which was entered at DE 61 therein.	0.40	375.00	150.00
12/10/19	JZ	Attention to numerous e-mails regarding status of putative defendant Tolling Agreement.	0.20	195.00	39.00
12/10/19	JZ	Receipt and review of the Order Granting Motion to Stay Adversary Proceeding and Setting Deadlines in the Fuel Oil adversary; calendar hearing date and deadlines; circulate same; update electronic case profile.	0.40	195.00	78.00
12/10/19	JZ	Receipt and review of SCC's Informative Motion Regarding Motion to Stay Adversary Proceeding and proposed order in the Fuel Oil adversary; circulate same; receipt of SCC's counsel notice to withdraw said filing; update electronic case profile.	0.30	195.00	58.50
12/12/19	JA	Review and execute Addendum to Tolling Agreement for additional, potential party	0.20	575.00	115.00
12/12/19	JMS	Continued attention to tolling agreements and proposed complaint against tolled entities.	1.70	500.00	850.00
12/12/19	IRS	Confer regarding pending litigation matters related to the Marrero class action claims and provide analysis regarding stay orders as affecting the litigation deadlines.	0.50	350.00	175.00

12/13/19	MGG	Review pleadings PREPA 9540, 9541 in connection with approval of RSA settlement and 9019 Motion. (.40). Track status of positions asserted by various parties. (.30).	0.70	575.00	402.50
12/13/19	JA	Receive multiple correspondence with SCC counsel regarding discovery responses (.2); Review correspondence regarding strategy relating to Sculptor (.1); Review five revised Notices of Dismissal (.2); Review correspondence to and from counsel for Sculptor regarding production (.2) Review draft of response to meet and confer correspondence regarding ultra vires issues (.3); Review correspondence from counsel for Bondholders regarding meet and confer on discovery deficiency correspondence (.2); Review correspondence among counsel regarding bondholder correspondence (.2); Review draft correspondence to bondholder counsel and strategy emails among responding party counsel (.5) Review correspondence to FOMB responses to subpoenas (.2);	2.10	575.00	1,207.50
12/13/19	JA	Review correspondence from counsel for Special Claims Committee regarding Tolling Agreements that remain unexecuted	0.20	575.00	115.00
12/13/19	AMC	Attend to communications with co-plaintiff counsel concerning extensions of tolling agreements	0.20	375.00	75.00
12/16/19	JHG	Review additional documents in PREPA Fuel Oil case.	1.30	765.00	994.50
12/16/19	IRS	Review Order to Show Cause entered by Magistrate Judge relating to Motion for Alternative Service and reissuance of summonses.	0.20	350.00	70.00
12/17/19	JA	Review correspondence from Special Claims Committee counsel regarding Tolling Agreements (.1); Review correspondence to counsel for tolled parties from Special Claims Committee (.1); Review Tolling Agreements and execute same (.2); Review Court Orders [DE 1833] (.1); Review Court Order [DE 1834] (.1.)	0.60	575.00	345.00
12/17/19	AMC	Review and prepare tolling agreement for execution.	0.20	375.00	75.00
12/17/19	JZ	Receipt and review of Eighth Revised Order Extending Deadlines relating to PREPA 9019 motion; calendar deadlines; e-mails from and to S. Siff regarding cancellation of January 14th hearing; update electronic case profile.	0.40	195.00	78.00
12/18/19	JA	Review Motion to Allow filing of the LEI Report [D.E. 1837] and strategize regarding same (.4)	0.40	575.00	230.00
12/19/19	JHG	Review ECF 9609 (PREPA 1835) regarding motion in limine.	1.10	765.00	841.50
12/19/19	JA	Review multiple correspondence from Special claims Committee ("SCC") to counsel for tolled parties (.2); Strategize with Angelo Castaldi (.3); Review correspondence from counsel for Tolled Party (.1); Review extensive correspondence with SCC and responses regarding preparation of complaint in event tolled parties do not execute addendum and enlargement (.6); Confer with Rosa Sierra of SCC regarding strategy (.3); Confer with Angelo	2.10	575.00	1,207.50

		Castaldi regarding procedural posture of tolled party and asserting claims and coordinating with SCC (.6)			
12/19/19	AMC	Reviewed and analyzed the Court's order staying Adv. Case No. 19-388 with particular reference to effect on tolled non-party defendants	0.40	375.00	150.00
12/20/19	JA	Review correspondence with tolled party counsel	0.20	575.00	115.00
12/22/19	JA	Review working draft of complaint against tolled party (.6); revise same (.2); Strategize with Angelo Castaldi regarding procedural issues (.3); Confer with Mike Friedman regarding additional review issues (.2); Strategize with Jesus Suarez (.1)	1.40	575.00	805.00
12/22/19	AMC	Reviewed and analyzed draft complaint for filing against tolled party (2.1), and prepare revisions to the same / analyze underlying factual source material concerning the same	4.40	375.00	1,650.00
12/23/19	MAF	Review emails among group regarding draft complaint against Petrobras (0.4); phone call with A Castaldi regarding the same (0.1); review email from A Castaldi containing comments about draft complaint, and review draft complaint (1.8);	2.30	550.00	1,265.00
12/23/19	JA	Review correspondence to counsel for Government Parties regarding tolled party complaint (.1); Review executed addendum to Tolling Agreement (.2); Review correspondence from Special Claims Counsel (.2); Review Motion by mediation team (.1); Review order granting enlargement (.1)	0.70	575.00	402.50
12/23/19	AMC	Reviewed, analyzed, and compiled transfer / payment data from PREPA to tolled defendant in conjunction with potential filing of adversary defendant (1.3); Attend to further revisions to draft amended complaint against said party and related internal communications (3.2); Review of underlying contracts involving said tolled defendant (1.1)	5.60	375.00	2,100.00
12/27/19	AMC	Review of the Government Parties' Unopposed Motion for Ninth Revised Order Extending and Establishing Certain Deadlines [ECF 9659]	0.20	375.00	75.00
12/30/19	JZ	Receipt and review of Order Setting Briefing Schedule on Joint Motion Urgent Unopposed Motion of Government Parties for Ninth Revised Order Extending and Establishing Certain Deadlines Applicable to the 9019 Motion; calendar deadlines; update electronic case profile.	0.30	195.00	58.50
Subtotal: B191 / General Litigation			75.60		\$33,284.50
B195 / Non-Working Travel					
12/10/19	JA	Travel to San Juan for Omnibus hearing. [travel billed at 1/2 of hourly rate]	4.20	287.50	1,207.50
12/11/19	JA	Travel from Omnibus hearing. [travel billed at 1/2 of hourly rate]	5.10	287.50	1,466.25
Subtotal: B195 / Non-Working Travel			9.30		\$2,673.75

Total **97.70** **\$42,682.25**

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
ARD	Allison R Day	Sr. Partner	2.80	625.00	1,750.00
JHG	John H Genovese	Sr. Partner	5.30	765.00	4,054.50
JA	John Arrastia	Partner	9.30	287.50	2,673.75
JMS	Jesus M Suarez	Partner	9.50	500.00	4,750.00
MAF	Michael A Friedman	Partner	2.30	550.00	1,265.00
MGG	Mariaelena Gayo-Guitian	Partner	4.40	575.00	2,530.00
JA	John Arrastia	Partner	25.70	575.00	14,777.50
IRS	Irina R Sadovnic	Associate	1.00	350.00	350.00
AMC	Angelo M Castaldi	Associate	22.30	375.00	8,362.50
JNS	Jessey N Sardina	Paralegal	6.30	75.00	472.50
JZ	Johana Zamora	Paralegal	8.80	195.00	1,696.50
Total			97.70		\$42,682.25

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	309.00
	Pacer - Online Research	48.60
12/10/2019	Airfare Miami- San Juan Omnibus Hearing on 12/11 (12272-002) John Arrastia	377.40
12/10/2019	Airfare flight change San Juan - Miami Omnibus Hearing on 12/11 (12272-002) John Arrastia	275.00
12/10/2019	Meals Areas USA Omnibus Hearing on 12/11 (12272-002) John Arrastia	13.26
12/11/2019	Parking Omnibus Hearing on 12/11 (12272-002) John Arrastia	34.00

Total Costs incurrent and advanced **\$1,057.26**

Current Fees and Costs **\$43,739.51**

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020
Please Refer to
Invoice Number: 96954-P

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered inside of Puerto Rico)

For fees for professional services for the period ending Dec 31, 2019	2,185.00
Costs incurred and advanced	368.57
Current Fees and Costs Due	2,553.57

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Dec 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B155 / Court Hearings					
12/11/19	JA	Attend Omnibus hearing.	2.40	575.00	1,380.00
Subtotal: B155 / Court Hearings			2.40		\$1,380.00
B191 / General Litigation					
12/10/19	JA	Confer with Special Claims Committee regarding filing of Order and Informative Motion regarding Stay (.2); Attention to Failure by Tolled Defendants to provide addendum extending Tolling Agreement (.2). Review and analyze Court Order regarding Stay [DE 61] (.3); Strategize regarding impact of stay order on case issues (.7)	1.40	575.00	805.00
Subtotal: B191 / General Litigation			1.40		\$805.00
Total			3.80		\$2,185.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JA	John Arrastia	Partner	3.80	575.00	2,185.00
Total			3.80		\$2,185.00

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/10/2019	Meals STK Restaurant San Juan Omnibus Hearing on 12/11 (12272-002) - dinner J. Arrastia John Arrastia	40.00
12/10/2019	Ground Transportation Uber Omnibus Hearing on 12/11 (12272-002) John Arrastia	11.84
12/11/2019	Hotel Condado Vanderbilt Hotel Omnibus Hearing on 12/11 (12272-002) John Arrastia	300.00
12/11/2019	Ground Transportation Uber Omnibus Hearing on 12/11 (12272-002) John Arrastia	8.40
12/11/2019	Ground Transportation Uber Omnibus Hearing on 12/11 (12272-002) John Arrastia	8.33
Total Costs incurrent and advanced		\$368.57

Current Fees and Costs **\$2,553.57**

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020
Please Refer to
Invoice Number: 96955

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Dec 31, 2019

22,072.00

Costs incurred and advanced

Current Fees and Costs Due

22,072.00

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Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020

Please Refer to

Invoice Number: 96955

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Dec 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B165 / Fee-Employment Other Professionals					
12/04/19	JA	Review email regarding retention of professional to perform analysis.	0.10	575.00	57.50
Subtotal: B165 / Fee-Employment Other Professionals			0.10		\$57.50
B191 / General Litigation					
12/01/19	JA	Review draft interrogatories and requests for admissions (1.1); Review comments from Paul Hastings to discovery (.2); Review comments of Government Parties (.2); Review comments of Retiree Committee (.2);	1.70	575.00	977.50
12/02/19	JA	Review email correspondence from FOMB regarding discovery (.1); Review correspondence regarding discovery issues and strategy (.3); Review Committee correspondence regarding pending discovery responses (.1); Review Amended Informative Motion and exhibits regarding corrected list of ERS Notices and Notices of Participation (.3); Confer with counsel for Special Claims Committee regarding Motion to Dismiss filed in ERS actions AP-361 and attend to related issues (.3); Review revised responses (.3); Review court order [DE 37 in AP 361] (.1); Confer with counsel for SCC of FOMB regarding Motion to Dismiss and case strategy (.2); Strategize as to response (.2); Review correspondence to and from counsel in AP 361 (.2);	2.10	575.00	1,207.50
12/02/19	JZ	Receipt and review of Order Setting Briefing Schedule on Motion to Dismiss filed by I. Rodriguez in ADV. 19-00361; circulate same; calendar response and reply deadline; update electronic case profile.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
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12/03/19	JA	Receive and review proposed draft Motion to Strike Rodriguez MTD in AP-361 (.3); Confer with co-counsel for Special Claims Committee (.1); Review email from SCC to additional counsel (.1); Review Reply In Support of Renewed Motion of Certain Secured Creditors of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico for Appointment as Trustees Under 11 U.S.C. § 926 (.2); Review correspondence with Proskauer regarding discovery responses (.1); Review correspondence regarding additional revisions to discovery (.1); Review discovery responses of Fiscal Agent (.7); Review discovery responses of Retiree Committee (.3)	1.90	575.00	1,092.50
12/03/19	IRS	Review and edit draft motion to strike motion to dismiss filed in AP 19-361. (.6)	1.40	350.00	490.00
		Review final motion to strike motion to dismiss filed in AP 19-361 and prepare correspondence regarding GJB signature authority. (.3)			
		Review and prepare response to co-plaintiff's counsel regarding edits and strategy relating to AP 19-361. (.5)			
12/03/19	IRS	Review and analyze multiple versions of draft responses to discovery requests relating to the ERS Clawback Litigation. (2.2)	3.20	350.00	1,050.00
		Prepare correspondence to UCC counsel regarding status of the responses for filing and confer relating to GJB approval of responses. (.4)			
		Review extensive correspondence regarding filing and service of ERS discovery responses. (.6)			
12/03/19	AMC	Attend to communications with bondholder defendant's counsel.	0.10	375.00	37.50
12/04/19	JA	Attend to Status of Motion to Dismiss filed in Contravention of Stay in 19-3C1 (.2); review executed discovery responses (.1); review Motion to Inform [DE 734] (.1)	0.40	575.00	230.00
12/04/19	IRS	Review correspondence regarding motion to strike defendant's motion to dismiss in AP 19-361.	0.30	350.00	105.00
12/04/19	AMC	Analyze responses to request for production served by ERS challenged bond defendant, and review of master DTC data concerning said defendant.	1.30	375.00	487.50
12/04/19	AMC	Telephone conference with S. Wolfe of Morgan Lewis concerning challenged bond adversary.	0.30	375.00	112.50
12/05/19	JA	Reveiw correspondence regarding third-party discovery	0.20	575.00	115.00
12/05/19	JMS	Review discovery issues and provide analysis regarding same.	2.80	500.00	1,400.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
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12/05/19	IRS	Review correspondence from T. Axelrod and J.Mudd regarding AP 19-361 and the withdrawal of the pending motion to dismiss. (.4)	0.70	350.00	245.00
		Review filed notice of withdrawal of motion and notice of withdrawal of representation from J. Mudd. (.3)			
12/05/19	JZ	Receipt and review of Notice of Withdrawal of Motion to Dismiss Case filed by Iris Rodriguez-Vazquez in ADV 19-00361; receipt and review of Motion resigning legal representation for Iris Rodriguez-Vazquez and order granting same; circulate same; update electronic case profile.	0.40	195.00	78.00
12/09/19	JA	Review correspondence from ERS Bonholders and draft stipulation (1.2); Review discovery deficiency letter drafts to Fiscal Agent (.7):	1.90	575.00	1,092.50
12/10/19	JA	Review discovery update from co-Plaintiff (.3); Review draft letter to fiscal agent and ERS Bondholders (.6)	0.90	575.00	517.50
12/10/19	IRS	Review and revise draft correspondence to ERS bondholders regarding discovery response deficiencies. (1.6)	1.90	350.00	665.00
		Review correspondence from ERS counsel regarding coordinated discovery efforts relating to ERS responses and objections received from the bondholders. (.3)			
12/11/19	JA	Review correspondence to and from Proskauer and other participating parties regarding Discovery Responses (.3) Review revised correspondence to Fiscal Agent and Bondholders (.3); Review comments and edits to revisions (.3)	0.90	575.00	517.50
12/11/19	IRS	Review correspondence between ERS Counsel regarding ERS Bondholders' objections and responses to discovery.	0.60	350.00	210.00
12/12/19	JA	Review draft correspondence regarding bondholders and interrogatory responses (.3); Review five dismissals proposed by SCC for filing (.6); Review UBS Motion for Relief from Automatic Stay (.2); Review correspondence with Special Claims Counsel for FOMB regarding Sculptor (.2); Review correspondence from Proskauer on behalf of FOMB regarding RFP responses (.2)	1.50	575.00	862.50
12/13/19	AMC	In respect of adversary proceeding 19-AP-355, reviewed discovery responses furnished by counsel for adversary defendant and cross-reference the same against CUSIP information (1.1), and attend to communications concerning the same (.3)	1.40	375.00	525.00
12/13/19	IRS	Attend to extensive correspondence regarding draft communications to ERS Bondholder counsel relating to discovery responses and good faith conference scheduling and analyze all draft communications. (1.6)	1.60	350.00	560.00
12/14/19	JA	Review draft response to Bondholder discovery letter regarding interrogatories (.2) and comments to correspondence from other counsel (.1)	0.30	575.00	172.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 96955

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12/15/19	JA	Review additional comments to Bondholders regarding Ultra Vires RFP, Interrogatories, and Bondholder discovery letter (.6); Review revised draft email to bondholders (.2);	0.80	575.00	460.00
12/15/19	JA	Review correspondence regarding Sculptor discovery responses (.2); Confer with counsel for SCC of FOMB (.2); Strategize with Angelo Castaldi regarding challenged bond adversary proceeding with Sculptor (.3); Review comments of multiple participating counsel for responding parties (.3); Review correspondence to Bondholder Counsel (.1); Confer with counsel on third party document production and review related correspondence (.2); Review correspondence from bondholder counsel in response (.2); Review communication from SCC of FOMB regarding various discovery-related issues (.1); Review correspondence to Sculptor (.1); Review correspondence among parties regarding meet and confer (.2); Review draft correspondence to bondholder's lien scope discovery correspondence (.4); Review draft correspondence to bondholder's ultra vires discovery correspondence (.4); Review correspondence to Bondholder counsel (.1);	2.70	575.00	1,552.50
12/15/19	AMC	Confer and strategize with J. Arrastia regarding Sculptor discovery issues.	0.30	375.00	112.50
12/16/19	AMC	Review correspondence from counsel regarding document production and relationship to named defendant and court orders concerning production and dismissal procedures (1.1); review of excel production tracks/database concerning named defendant (1.4); and prepare for/attend call with opposing counsel concerning production issues and case issues (1.1)	3.60	375.00	1,350.00
12/16/19	IRS	Review correspondence from Jones Day and ERS Counsel regarding production of third-party documents.	0.60	350.00	210.00
12/16/19	IRS	Review comments by ERS Counsel relating to draft correspondence to ERS bondholders regarding deficient interrogatory responses.	0.40	350.00	140.00
12/16/19	JZ	Receipt and review of Notice of Voluntary Dismissal as to: Defendant 38G in ADV. 19-361; circulate same; update master defendant excel sheet; update electronic case profile.	0.40	195.00	78.00
12/17/19	JA	Review correspondence from counsel for Sculptor (.1); Review draft correspondence regarding meet and confer regarding ERS responses and objections regarding ultra vires interrogatories (.2); Review update regarding Bondholder discovery issues (.1);	0.40	575.00	230.00
12/17/19	IRS	Review draft correspondence prepared by OMM and Proskauer teams to ERS Bondholders regarding lien scope discovery response issues and review extensive correspondence with comments and revisions to same. (1.2)	1.50	350.00	525.00
		Provide brief analysis of ERS claims and discovery process. (.3)			

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 96955

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12/18/19	JA	Review 30(b)(6) deposition notices (.4); Review strategy communication among counsel regarding discovery (.1); Review deposition subpoena (.1);	0.60	575.00	345.00
12/18/19	IRS	Review proposed list of deponents in ERS AP 19-356, 357, 359, 361, and 367. (.3)	0.60	350.00	210.00
		Prepare correspondence to ERS Counsel regarding communications with ERS Bondholder counsel relating to a good faith conference on discovery issues. (.3)			
12/20/19	JA	Review update and strategy circulated among counsel responding to Bondholder discovery (.3); review comments from multiple counsel to joint stipulation for protective order proposed by bondholders (.5);	0.80	575.00	460.00
12/20/19	IRS	Review draft responses to ERS discovery prepared by Paul Hastings.	0.60	350.00	210.00
		Review correspondence regarding Committee and government party positions relating to specific discovery responses and advisor only document designation.			
12/23/19	JA	Review Order Amending order [DE 19 in AP 280 and other cases] (.2); Review correspondence from Bondholder counsel regarding follow up to meet and confer and revised protective order (.4); Review Government Parties follow up to meet and confer (.2); Review correspondence from Fiscal Agent regarding follow up to meet and confer (.2); Review draft supplemental informative motion (.1);	1.10	575.00	632.50
12/26/19	JA	Review bondholder correspondence regarding discovery	0.10	575.00	57.50
12/26/19	IRS	Review correspondence between ERS counsel regarding comments and edits to draft supplemental informative motion.	0.30	350.00	105.00
12/27/19	JA	Review comments to Joint Stip regarding confidential information and correspondence related to discovery issues (.4); Review correspondence to bondholders (.1);	0.50	575.00	287.50
12/27/19	IRS	Review analysis from ERS Counsel regarding designation and treatment of confidential documents produced through discovery.	0.30	350.00	105.00
12/30/19	JA	Review draft protective order with proposed edits from Bondholders (.3); Review comments among counsel (.2); Review correspondence from bondholders (.2); Review supplemental responses to interrogatories (ultra vires)(.3); Review supplemental responses to interrogatories (lien scope) (.2); Review Fiscal Agent supplemental response to RFA (.2); Review Fiscal Agent Supplemental Interrogatories (.2); Review correspondence regarding FOMB responses to Subpoena regarding Ultra Vires (.1).	1.70	575.00	977.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 96955

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12/30/19	IRS	Review Bondholders' objections and responses to ERS discovery requests and correspondence from Defendants' Counsel. (1.3)	2.30	350.00	805.00
		Review fiscal agent's response and objections to interrogatories and requests for production. (1)			
12/30/19	JZ	Receipt and review of Answer to Second Amended Complaint filed by Defendant 1-G-50G in ADV. 19-00361; circulate same; update electronic case profile.	0.40	195.00	78.00
12/31/19	JA	Review correspondence regarding case updates and strategy regarding discovery (.2);	0.20	575.00	115.00
12/31/19	IRS	Review correspondence between ERS Counsel and draft responses regarding ERS discovery objections and other related matters.	0.40	350.00	140.00
Subtotal: B191 / General Litigation			48.80		\$22,014.50
Total			48.90		\$22,072.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	2.80	500.00	1,400.00
JA	John Arrastia	Partner	20.80	575.00	11,960.00
IRS	Irina R Sadovnic	Associate	16.70	350.00	5,775.00
AMC	Angelo M Castaldi	Associate	7.00	375.00	2,625.00
JZ	Johana Zamora	Paralegal	1.60	195.00	312.00
Total			48.90		\$22,072.00

Current Fees and Costs

\$22,072.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020
Please Refer to
Invoice Number: 96956

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Dec 31, 2019	232.00
Costs incurred and advanced	
Current Fees and Costs Due	232.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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Account Number : 21007711

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100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

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Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

February 11, 2020

Please Refer to

Invoice Number: 96956

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Dec 31, 2019

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
12/19/19	MGG	Review and track litigation regarding pending adversaries in HTA.	0.20	575.00	115.00
12/19/19	JZ	Receipt and review of Interim Case Management Order in Case No 19-364 regarding revenue bonds; calendar the numerous deadlines based on the different Lift Stay Motions and Revenue Bond Complaint; calendar hearing dates contained in order; circulate same; update electronic case profile on each matter.	0.60	195.00	117.00
Subtotal: B191 / General Litigation			0.80		\$232.00
Total			0.80		\$232.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
MGG	Mariaelena Gayo-Guitian	Partner	0.20	575.00	115.00
JZ	Johana Zamora	Paralegal	0.60	195.00	117.00
Total			0.80		\$232.00

Current Fees and Costs

\$232.00

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97219

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jan 31, 2020	176,018.75
Costs incurred and advanced	8,339.98
Current Fees and Costs Due	184,358.73

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Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

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Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jan 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
01/02/20	MGG	Review report of Steve Siff with analysis of court filings in the Main Case, Title III cases and Adversary Proceedings re; pending matters related to pending litigation.	0.60	575.00	345.00
01/06/20	JZ	Review of internal report circulated by S, Siff.	0.40	195.00	78.00
01/07/20	IRS	Review docket entry updates and recent order summaries from S. Siff.	0.40	350.00	140.00
01/07/20	IRS	Confer with paralegal staff regarding service of court orders in AP-281, 267, and 364.	0.20	350.00	70.00
01/07/20	JZ	Review of internal report circulated by S, Siff.	0.30	195.00	58.50
01/08/20	JZ	Review of internal report circulated by S, Siff.	0.20	195.00	39.00
01/09/20	IRS	Review daily docket entry updates and order summaries from S. Siff.	0.30	350.00	105.00
01/09/20	JZ	Attention to verification of calendaring deadlines in all matters.	1.10	195.00	214.50
01/09/20	JZ	Review of internal report circulated by S, Siff.	0.40	195.00	78.00
01/09/20	JZ	Receipt and review of Order on Urgent Omnibus Motion for Re-Issuance of Summons and/or Authorization of Service by Publication or Alternative Request for Order to (I) Make Service within a Specified Time or (II) Extend Time for Service for an Appropriate Period; verify that the adversary cases wherein GJB is involved is not listed on the Order; update electronic case profile.	0.40	195.00	78.00
01/10/20	IRS	Review docket entry updates and order summaries from S. Siff.	0.20	350.00	70.00
01/12/20	JA	Strategize and prepare memorandum (internal) regarding case strategy and litigation plan.	1.70	575.00	977.50
01/12/20	MGG	Review and respond to internal memorandum from John Arrastia regarding case strategy and litigation plan.	0.40	575.00	230.00
01/13/20	IRS	Confer with paralegal staff regarding updated case information sheets and strategizing regarding best practices for maintaining an updated case-list database. (.6)	1.40	350.00	490.00
		Confer with A. Castaldi regarding GJB-involved adversary proceedings and discuss proper procedure for deadline tracking.(.4)			
		Review docket entry updates and recent order summaries. (.2)			

		Circulate internal correspondence with updated GJB-involved case-list. (.2)			
01/13/20	AMC	Meeting to discuss pending adversary proceedings and various case management needs.	0.30	375.00	112.50
01/13/20	AMC	Confer with I. Sadovnic regarding adversary proceeding tracking.	0.40	375.00	150.00
01/13/20	AMC	Confer with J. Zamora regarding deadline tracking and case calendar management.	0.20	375.00	75.00
01/13/20	IRS	Confer with J. Zamora regarding deadline tracking and case calendar management.	0.20	350.00	70.00
01/13/20	JNS	Conference with A. Castaldi, I. Sadovnic, S. Siff and J. Sardina regarding calendar management and indexing (.6) Conference with Stiff regarding list of Stayed cases and cases dismissed.	0.80	75.00	60.00
01/13/20	JZ	Conference with A. Castaldi, I. Sadovnic, S. Siff and J. Sardina regarding calendar management and indexing.	0.60	195.00	117.00
01/13/20	JZ	Receipt and review of internal report circulated by S. Siff.	0.30	195.00	58.50
01/13/20	SS	Confer with J. Zamora regarding deadline tracking and case calendar management.	0.20	195.00	39.00
01/15/20	JA	Refine litigation strategy for conference with committee.	1.60	575.00	920.00
01/15/20	IRS	Follow-up with paralegal staff regarding internal master case-list project.	0.30	350.00	105.00
01/21/20	JZ	Review of internal report circulated by S. Siff.	0.60	195.00	117.00
01/21/20	JZ	Attention to Order Regarding Procedures for Attendance at the January 29th Omnibus hearing; e-mails regarding attendance at same.	0.20	195.00	39.00
01/23/20	IRS	Review extensive docket entry updates from S. Siff and review recent orders granting extensions of time in adversary proceedings, and informative motions regarding attendance and participation at upcoming hearings.	0.60	350.00	210.00
01/23/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
01/27/20	JA	Prepare and finalize committee presentation materials.	1.20	575.00	690.00
01/27/20	JA	Confer with committee counsel Luc Despins regarding pending committee issues and collaboration on conflict issues (.3).	0.30	575.00	172.50
01/27/20	IRS	Review docket entry updates and recent order summaries from S. Siff.	0.50	350.00	175.00
01/27/20	JZ	Review of internal report circulated by S, Siff.	0.40	195.00	78.00

01/28/20	IRS	Review agenda for January 29 omnibus hearing. (.2)	0.50	350.00	175.00
		Review docket entry updates and order summaries prepared by S. Siff. (.3)			
01/28/20	JZ	Review of internal report circulated by S. Siff.	0.50	195.00	97.50
01/29/20	IRS	Review docket entry updates and recent order summaries from S. Siff. (.3)	0.30	350.00	105.00
01/29/20	CBH	Meeting with M. Guitian regarding case management order and related pleadings; send copies for review.	0.40	195.00	78.00
01/29/20	JZ	Review of internal report circulated by S. Siff.	0.30	195.00	58.50
01/30/20	JZ	Review of internal report circulated by S. Siff.	0.40	195.00	78.00
Subtotal: B110 / Case Administration			19.50		\$6,832.00

B113 / Pleadings Review

01/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late December 31 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/02/20	SS	Prepare digest of matters and filings from late on December 31 relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50
01/02/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/02/20	SS	Prepare digest of matters and filings on January 2 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
01/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on late January 2 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/03/20	SS	Prepare digest of matters and filings from late January 2 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/03/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 3 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
01/03/20	SS	Prepare digest of matters and filings on January 3 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00

01/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late January 3 through January 5 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
01/06/20	SS	Prepare digest of matters and filings from late January 3 through January 5 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
01/06/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
01/06/20	SS	Prepare digest of matters and filings on January 6 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
01/07/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceeding from late January 6 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
01/07/20	SS	Prepare digest of matters and filings from late January 6 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/07/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 7 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/07/20	SS	prepare digest of matters and filings on January 7 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/08/20	SS	Prepare digest of matters andc filings from late January 7 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/08/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late January 7 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/08/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 8 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/08/20	SS	Prepare digest of matters and filings on January 8 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
01/09/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late January 8 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00

01/09/20	SS	Prepare digest of matters and filings from late on January 8 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
01/09/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/09/20	SS	Prepare digest of matters and filings on January 9 relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/10/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late January 9 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/10/20	SS	Prepare digest of matters and filings from late on January 9 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/10/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 10 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
01/10/20	SS	Prepare digest of matters and filings on January 10 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/13/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late January 10, through January 12 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
01/13/20	SS	Prepare digest of matters and filings from late January 10 through January 12 relevant to special litigation counsel and distribute to appropriate team members.	1.20	195.00	234.00
01/13/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 13 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
01/13/20	SS	Prepare digest of matters and filings on January 13 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/21/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings during week of January 13-20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	3.30	195.00	643.50
01/22/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from January 13-20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	4.20	195.00	819.00

01/23/20	SS	Continued Review and Analysis of all court filings in the Main Case, Title III cases and Adversary Proceedings from January 13-20 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.30	195.00	448.50
01/23/20	SS	Began preparation of digest of matters and filings from January 13-20 and January 21-22 relevant to special litigation counsel and distribute to appropriate team members.	3.80	195.00	741.00
01/23/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 21 and 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/24/20	SS	Completed Review and Analyze of all court filings in the Main Case, Title III cases and Adversary Proceedings from January 13 through January 20 and prepared digest, consisting of several emails, of matters relevant to special litigation counsel and distribute to appropriate team members.	2.80	195.00	546.00
01/24/20	SS	Concluded review and analysis of all court filings in the Main Case, Title III cases and Adversary Proceedings on January 21 and 22 and prepared digest of matters, consisting of several emails, relevant to special litigation counsel and distribute to appropriate team members.	4.70	195.00	916.50
01/27/20	SS	Completed Review and Analyze of all court filings in the Main Case, Title III cases and Adversary Proceedings on January 21 and 22 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.20	195.00	429.00
01/27/20	SS	prepare digest of matters and filings from January 21 and 22 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/27/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 23 and 24 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/27/20	SS	Prepare digest of matters and filings on January 23 and 24 relevant to special litigation counsel and distribute to appropriate team members.	1.30	195.00	253.50
01/28/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from January 27 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.90	195.00	370.50
01/28/20	SS	Prepare digest of matters and filings from January 27 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
01/28/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 28 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	0.90	195.00	175.50

01/28/20	SS	Prepare digest of matters and filings on January 28 relevant to special litigation counsel and distribute to appropriate team members.	0.80	195.00	156.00
01/29/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on January 28 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
01/29/20	SS	Prepare digest of matters and filings late on January 28 relevant to special litigation counsel and distribute to appropriate team members.	1.10	195.00	214.50
01/29/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 29 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/29/20	SS	Prepare digest of matters and filings on January 29 relevant to special litigation counsel and distribute to appropriate team members.	1.70	195.00	331.50
01/30/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings from late on January 29 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	2.10	195.00	409.50
01/30/20	SS	Prepare digest of matters and filings from late on January 29 relevant to special litigation counsel and distribute to appropriate team members.	1.60	195.00	312.00
01/30/20	SS	Review and Analyze all court filings in the Main Case, Title III cases and Adversary Proceedings on January 30 in order to prepare digest of matters relevant to special litigation counsel and distribute to appropriate team members.	1.80	195.00	351.00
01/30/20	SS	Prepare digest of matters and filings on January 30 relevant to special litigation counsel and distribute to appropriate team members.	1.40	195.00	273.00
Subtotal: B113 / Pleadings Review			97.90		\$19,090.50

B150 / Meetings of Creditors

01/15/20	JA	Attend committee call regarding case matters.	0.60	575.00	345.00
01/20/20	JA	Consider and strategize regarding agenda items for Committee meeting.	0.30	575.00	172.50
01/21/20	JA	Prepare agenda items for Committee meeting.	0.10	575.00	57.50
01/22/20	JA	Telephone conference with Committee Chair regarding case issues and strategy.	0.50	575.00	287.50
01/24/20	JA	Revise litigation strategy memorandum for meeting with Committee.	1.10	575.00	632.50
01/27/20	JA	Confer with committee member counsel regarding meeting issues (.4).	0.40	575.00	230.00

Subtotal: B150 / Meetings of Creditors			3.00		\$1,725.00
B155 / Court Hearings					
01/29/20	MGG	Attend via telephone hearings held in Puerto Rico before Judge Swain. 9:30 -12:00 pm (2.50). Afternoon Hearings 1-3 pm (2.0). Email to John Arrastia re: Court Hearings and rulings (.30). Conference with John Arrastia regarding Court Hearings and rulings that affect pending litigation (.40).	5.20	575.00	2,990.00
01/29/20	JA	Confer and strategize with M. Guitian regarding court hearing and rulings.	0.40	575.00	230.00
Subtotal: B155 / Court Hearings			5.60		\$3,220.00
B160 / Fee/Employment Applications					
01/06/20	MGG	Follow up email to Committee on approval of GJB October Fee Statement and January 2020 Budget.	0.30	575.00	172.50
01/09/20	JA	Review fee statements for conformity with fee examiner specification and requirements.	1.10	575.00	632.50
01/10/20	MGG	Prepare and serve October Monthly Fee Statement and January Budget on Notice Parties.	0.50	575.00	287.50
01/10/20	CE	Draft and finalize October 2019 Fee Statement with exhibits. E-mail correspondence with M. Guitian re: same.	0.50	150.00	75.00
01/13/20	JA	Review and revise November statements for conformity with guidelines.	1.80	575.00	1,035.00
01/30/20	JA	Review and revise December fee statements to conform to Fee Examiner guidelines.	1.30	575.00	747.50
Subtotal: B160 / Fee/Employment Applications			5.50		\$2,950.00
B161 / Budgeting					
01/08/20	MGG	Review, comment and revise GJB February 2020 Budget.	1.00	575.00	575.00
01/10/20	JA	Review PH budget to confirm accuracy of GJB role.	0.30	575.00	172.50
01/10/20	MGG	Detail correspondence to and from John Arrastia re: GJB's involvement in litigation going forward and impact on proposed February Budget.	0.60	575.00	345.00
01/12/20	JA	Prepare budget.	0.60	575.00	345.00
01/13/20	JA	Confer with M Guitian regarding February budget.	0.30	575.00	172.50
01/13/20	MGG	Confer with John Arrastia re: February Budget and rates going forward (.30).	0.30	575.00	172.50
01/20/20	JA	Revise budget to avoid duplication with Paul Hastings litigation.	0.40	575.00	230.00
01/20/20	MGG	Review and discuss revised February Budget with John	0.40	575.00	230.00

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01/20/20	JA	Confer with M. Guitian regarding budget (.4); prepare email regarding no rate increase (.1)	0.50	575.00	287.50
01/21/20	MGG	Review email from John Arrastia re: revised February Budget.	0.40	575.00	230.00
01/22/20	JA	Revise budget to accommodate expected changes in litigation.	0.30	575.00	172.50
01/22/20	MGG	Conference with John Arrastia re: revisions and adjustments to February 2020 budget.	0.30	575.00	172.50
01/22/20	MGG	Emails to and from John Arrastia re: revisions to February Budget to accommodate changes in litigation (.30). Revise February Budget (.70). Correspondence with Angelo Castaldi re: Pending adversary proceedings (.30).	1.30	575.00	747.50
01/22/20	JA	Email correspondence to and from M. Guitian regarding budget.	0.30	575.00	172.50
01/27/20	JA	Confer with M. Guitian regarding budget.	0.20	575.00	115.00
01/27/20	MGG	Emails to and from John Arrastia re: February Budget (.20). Finalize Budget and circulate to Committee (.40).	0.60	575.00	345.00
01/29/20	MGG	Correspondence to and from John Arrastia and Jesus Suarez re: in-person meeting with Committee and revisions to February Budget.(.30). Further Revise February Budget (.30).	0.60	575.00	345.00
01/29/20	JMS	Confer with J. Arrastia and M. Guitian regarding budgeting additional scope of work.	0.30	500.00	150.00
01/29/20	JA	Confer with M. Guitian regarding changes to budget after in-person meeting with Committee.	0.30	575.00	172.50
01/30/20	MGG	Telephone conference with John Arrastia re: February Budget and in-person Committee meeting.	0.30	575.00	172.50
01/30/20	MGG	Email to Committee Members with request for approval of revised February Budget.	0.30	575.00	172.50
01/31/20	MGG	Email to and from Committee re: approval of GJB's February Budget (.30). E-mail to and from Mark Hancock re: Request for further extension of submission of February Budget (.10).	0.40	575.00	230.00

Subtotal: B161 / Budgeting

10.00 \$5,727.50

B191 / General Litigation

01/02/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 57 (22 documents).	3.80	375.00	1,425.00
01/02/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 58 (29 documents).	3.30	375.00	1,237.50
01/02/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 24 (24 documents).	1.40	195.00	273.00

01/03/20	JHG	Review daily summary received from S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
01/03/20	JHG	Review ECF 9691, notice from Puerto Rico regarding payment of insurance proceeds.	0.40	765.00	306.00
01/03/20	JHG	Review ECF 754, regarding urgent motion to vacate administrative expense scheduling order.	0.40	765.00	306.00
01/03/20	JHG	Review ECF 1851 regarding renewed Puerto Rico motion.	0.30	765.00	229.50
01/03/20	JHG	Review ECF 9688, order granting urgent joint motion regarding stay and mediation.	0.50	765.00	382.50
01/03/20	JHG	Review ECF 9683, individual bondholder response regarding amended mediation order and review mediation order.	0.20	765.00	153.00
01/03/20	JHG	Review ECF 9677, motion for relief filed by Department of Health and Human Services..	0.30	765.00	229.50
01/03/20	JHG	Review additional daily summary from S. Siff to identify and analyze strategic litigation issues.	0.50	765.00	382.50
01/03/20	JHG	Review ECF 9694 regarding briefing on motion to lift stay.	0.20	765.00	153.00
01/03/20	JHG	Review ECF 9695 and analysis of memorandum regarding UCC objection to claim.	1.70	765.00	1,300.50
01/03/20	JHG	Review ECF 9696, PREPA urgent motion approving second amended stipulation.	0.40	765.00	306.00
01/03/20	JHG	Review ECF 9697, motion of bondholders to compel better answers.	1.40	765.00	1,071.00
01/03/20	JMS	Attention to upcoming deadlines in litigation matters and review compliance regarding same (1.6); attention to ongoing issues regarding dismissal of sculptor claims (.8)	2.40	500.00	1,200.00
01/03/20	JA	Review correspondence regarding service of Stay Orders pursuant to court order.	0.20	575.00	115.00
01/03/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 59 (25 documents).	3.70	375.00	1,387.50
01/03/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5, Tranche 60 (32 documents).	4.10	375.00	1,537.50
01/03/20	IRS	Review daily docket entry updates and recent order summaries from S. Siff.	0.30	350.00	105.00
01/03/20	SS	Review and Analyze database documents produced by Kobre and Klm, Batch SS2, Tranche 25 (36 documents)	1.20	195.00	234.00
01/05/20	IRS	Review stay orders and interim case management orders for AP 291, 297, 362, and 365. (.3)	0.50	350.00	175.00
		Review correspondence relating to service of stay orders and interim case management orders for AP 291, 297, 362, and 365. (.2)			
01/06/20	JHG	Review daily summary with S. Siff to identify and analyze strategic litigation issues.	0.40	765.00	306.00

01/06/20	JHG	Review ECF 9698 and 756 regarding urgent motion of committee regarding production of documents.	1.30	765.00	994.50
01/06/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 2295 - 2406).	4.20	565.00	2,373.00
01/06/20	JA	Review correspondence regarding service of stay orders.	0.20	575.00	115.00
01/06/20	JAF	Reviewed Kobre and Kim database documents in Batch JAF2, Tranche 2 (37 Documents).	2.90	465.00	1,348.50
01/06/20	SS	Review and analyze database documents produced by Kobre and Kim, Batch SS2, Tranch 26 (20 documents)	0.80	195.00	156.00
01/06/20	JZ	E-mails to and from PrimeClerk confirming service information for the Interim Case Management Order (Docket No. 9619) in ADV 19-297; review of service list.	0.40	195.00	78.00
01/07/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
01/07/20	JHG	Review ECF 9702, FOMB objection to proof of claims against Commonwealth regarding ERS bonds.	0.90	765.00	688.50
01/07/20	JHG	Review ECF 9073, objection to bondholder claims.	0.30	765.00	229.50
01/07/20	JHG	Review ECF 9705, objection to bondholder claims.	0.40	765.00	306.00
01/07/20	JHG	Review and analysis of ECF 9708, additional omnibus objection filed by UCC regarding ERS \$3.1 billion bond claims.	2.10	765.00	1,606.50
01/07/20	JHG	Review ECF 9709, additional objection filed by UCC regarding Oaktree claims.	0.40	765.00	306.00
01/07/20	JHG	Review ECF 758 in case 17-03566.	0.30	765.00	229.50
01/07/20	JHG	Review ERS objection to ERS bondholder claims and duplication of Fiscal Agent claims.	0.40	765.00	306.00
01/07/20	JHG	Review ECF 760, additional omnibus objection filed by UCC regarding ERS bondholders.	0.30	765.00	229.50
01/07/20	JHG	Review ECF 761 in case 17-03566.	0.30	765.00	229.50
01/07/20	JHG	Review ECF 762 in 17-03566 joinder in ERS objection.	0.20	765.00	153.00
01/07/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 2407 - 2446) (2.2). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 5 (Docs 2447 - 2500) (1.5). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 1 - 25) (1.9).	5.60	565.00	3,164.00

01/07/20	JAF	Reviewed Kobre and Kim database documents in Batch JAF2, Tranche 3 (42 Documents).	3.30	465.00	1,534.50
01/07/20	JZ	Draft Excel sheet containing all mediation and case management orders which require service via prime clerk, broken down by case; e-mail same to Prime Clerk for review and service; e-mails to and from T. Axelrod confirming accuracy of list.	1.50	195.00	292.50
01/07/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 27 (24 documents)	1.10	195.00	214.50
01/08/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
01/08/20	JHG	Review ECF 9717, joint urgent motion proposing objection deadlines and hearing date for motion to compel.	0.30	765.00	229.50
01/08/20	JHG	Review ECF 9716 scheduling order.	0.20	765.00	153.00
01/08/20	JHG	Review ECF 9719 UCC urgent motion for protective order regarding ERS liens and deposition of Mayol.	0.90	765.00	688.50
01/08/20	JHG	Review ERS ECF 767, proposed order regarding exchange of confidential information.	0.80	765.00	612.00
01/08/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 26 - 67) (2.2).	2.20	565.00	1,243.00
01/08/20	JMS	Review plan of adjustment and outline legal issues concerning potential litigation objection	3.40	500.00	1,700.00
01/08/20	JA	Confer with client regarding case issues; confer with Committee Chair regarding case issues.	1.30	575.00	747.50
01/08/20	JAF	Reviewed Kobre and Kim database documents in Batch JAF2, Tranche 4 (49 Documents).	3.50	465.00	1,627.50
01/08/20	AMC	Reviewed recent Commonwealth filings as to matters in which Firm serves as counsel, including: ECF 9715 Motion of Certain ERS Bondholders to Compel the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Provide Complete Answers to Interrogatories (.7); ECF 9719, Urgent Motion for a Protective Order Quashing the Deposition Subpoena Served on Retiree Committee's Counsel, specifically, Hector Mayol Kauffmann; and ECF 9711 (.4), Court's Ninth Revised Order Extending and Establishing Certain Deadlines Applicable to the PREPA 9019 Motion (.2)	1.30	375.00	487.50
01/08/20	JZ	Attention to Order of Reference to Magistrate Dien for general pretrial management related to the matters as to which the stay imposed by the Order Regarding Stay Period and Mandatory Mediation.	0.10	195.00	19.50
01/09/20	JHG	Review daily email summary from S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
01/09/20	JHG	Review ECF 9730 regarding objection to Late Vintage Bonds.	1.10	765.00	841.50

01/09/20	JHG	Review ECF 9731, urgent motion regarding omnibus objection.	0.50	765.00	382.50
01/09/20	JHG	Review ECF 9735 regarding GDB proofs of claim.	0.40	765.00	306.00
01/09/20	JHG	Review ECF 773 in 17-3566 regarding hearing date and same in ECF 17-3285.	0.30	765.00	229.50
01/09/20	JHG	Review ECF 9723, notice of appeal.	0.20	765.00	153.00
01/09/20	JMS	Confer and strategize with J. Arrastia regarding litigation plan.	0.60	500.00	300.00
01/09/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 68 - 81) (1.4). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 82-155) (2.3).	3.70	565.00	2,090.50
01/09/20	JA	Confer and strategize with Jesus Suarez regarding litigation plan (.6) and prepare specific issues for analysis and litigation (.6); strategize regarding case issues (.6)	1.80	575.00	1,035.00
01/09/20	JPB	Reviewed Kobre and Kim database documents in Batch JP5B, Tranche 3 (10 documents).	3.40	375.00	1,275.00
01/09/20	JAF	Reviewed Kobre and Kim database documents in Batch JAF2, Tranche 5 (29 Documents).	2.80	465.00	1,302.00
01/09/20	AMC	Review of arguments concerning Constitutional Debt Limit issue made by creditor group in its Omnibus Objection of the Lawful Constitutional Debt Coalition requesting entry of an order, finding that the following bonds were issued in excess of the debt limit set forth the Puerto Rico Constitution (the "Constitutional Debt Limit	0.80	375.00	300.00
01/09/20	AMC	Continued review of disclosure statement of Commonwealth	3.10	375.00	1,162.50
01/10/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 156 - 213) (1.3). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 214 - 220) (.7). Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 221 - 309) (3.4).	5.40	565.00	3,051.00
01/10/20	JMS	Continued factual development concerning potential litigation claims against tolled parties in the underwriter complaint and work on developing claims	3.20	500.00	1,600.00

01/10/20	JAF	Reviewed Kobre and Kim database documents in Batch JAF2, Tranche 6 (30 Documents).	2.60	465.00	1,209.00
01/10/20	SS	Review and Analyze database documents produced by Kobre and Kim, Batch SS2, Tranche 29, (40 documents)	1.50	195.00	292.50
01/10/20	TG	Communication with Trustpoint.One re: request for export of documents tagged as "hot docs" to date.	0.10	120.00	12.00
01/10/20	TG	Download exported data tagged as "HOT" to date and prepare communication to JP Bado with electronic location to same.	0.30	120.00	36.00
01/13/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.80	765.00	612.00
01/13/20	JHG	Review ECF 9702, omnibus objection to ERS bondholder claims and analysis of fiscal agent issues and taking claims.	0.80	765.00	612.00
01/13/20	JHG	Review Doc 9705 in Case 17-03283 objection to ERS claims.	0.30	765.00	229.50
01/13/20	JHG	Review additional omnibus objection, Doc 9708 additional omnibus objection regarding ERS bondholder and analysis of security interest issues.	1.10	765.00	841.50
01/13/20	JHG	Review additional omnibus objection regarding Ultra Vires issues.	0.90	765.00	688.50
01/13/20	JHG	Review ECF 9710, joinder of ERS.	0.20	765.00	153.00
01/13/20	JHG	Review omnibus objection Doc 759 in 17-03566.	0.50	765.00	382.50
01/13/20	JHG	Review ECF 761 in 17-03566.	0.30	765.00	229.50
01/13/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 310 - 375).	2.70	565.00	1,525.50
01/13/20	JA	Strategize regarding possible litigation strategy alternatives (1.3); review plan proposals regarding litigation (1.4)	2.70	575.00	1,552.50
01/13/20	JMS	Coordinate strategy concerning development of litigation claims in plan of adjustment process (1.4); research potential claims against adversary defendants in underwriter claim not currently asserted (2.3)	3.70	500.00	1,850.00
01/13/20	SS	Meeting with A. Castaldi and team to review new project (.3); began review of relevant Orders (.6)	0.90	195.00	175.50
01/14/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.70	765.00	535.50
01/14/20	JHG	Review ECF 9791 filed by Assured Guaranty.	0.40	765.00	306.00
01/14/20	JHG	Review ECF 9797, ERS 776 confidentiality stipulation.	1.00	765.00	765.00
01/14/20	JHG	Review ECF 9804, regarding urgent motion of Committee and government parties to compel.	0.90	765.00	688.50

01/14/20	JHG	Review ECF 9806, urgent UCC motion to compel production.	0.40	765.00	306.00
01/14/20	JHG	Review ECF 9808 regarding urgent motion of ERS bondholders to compel ERS to answer interrogatories.	1.00	765.00	765.00
01/14/20	JHG	Review ERS 775 (.2), Magistrate Order (.4), review and analyze internal action plan prepared by J. Arrastia (.7)	1.30	765.00	994.50
01/14/20	JMS	Review issues arising from plan of adjustment process and analyze for impact on litigation claims currently prosecuted by GJB.	1.40	500.00	700.00
01/15/20	JHG	Continued review and analysis of internal litigation plan.	2.40	765.00	1,836.00
01/15/20	JMS	Review issues relating to preservation of litigation claims in plan of adjustment and attention to new developments in mediation process.	1.60	500.00	800.00
01/15/20	JPB	Outline and analyze Kobre and Kim documents related to Puerto Rico agency issuances under the GDB in anticipation of drafting memorandum for client.	3.20	375.00	1,200.00
01/16/20	ALG	Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 434- 499) (2.3).	3.30	565.00	1,864.50
		Review financial related documents provided by Kobre Kim Report related to financial target claims and further identified as ALG Batch 6 (Docs 500 - 540) (1.0).			
01/16/20	JA	Review draft Objection to Amended ADR Motion.	0.20	575.00	115.00
01/16/20	JPB	Outline and analyze Kobre and Kim documents related to underwriter defendant actions from 2012 in anticipation of drafting memorandum for client.	4.30	375.00	1,612.50
01/16/20	TG	Prepare communication to Trustpoint re: reviewer issue while tagging.	0.10	120.00	12.00
01/17/20	SS	Review and Analyze database documents produced by Kobre and Kim, Btch SS2, Tranche 30, (135 documents)	3.60	195.00	702.00
01/17/20	JZ	Receipt and review of Notice of Voluntary Dismissal of Certain Defendants in ADV. 19-00282; update master excel sheet to remove defendants; update electronic case profile.	0.50	195.00	97.50
01/17/20	SS	Continued preparation of memorandum and chart for A. Castaldi analyzing stays in various Adversary proceedings	2.00	195.00	390.00
01/20/20	JHG	Legal research and analysis regarding chapter 11 provisions incorporated into Promesa legislation regarding litigation strategy issues.	2.70	765.00	2,065.50
01/20/20	JHG	Review and analysis of email from Alex Bongartz regarding various issues including complaints against bondholders and insurers.	1.10	765.00	841.50
01/20/20	JA	Review materials relating to Committee's strategy to new Adversary Proceedings (.3); strategize with John Genovese regarding development of litigation strategy as to different scenarios (.8)	1.10	575.00	632.50

01/21/20	JHG	Review email from Zachary Schreiber and objection of Assured Guaranty regarding mediation..	1.40	765.00	1,071.00
01/21/20	JMS	Continued analysis of litigation issues arising from plan and potential impairment of litigation claims.	3.70	500.00	1,850.00
01/21/20	JA	Review stipulation and motion regarding exchange of confidential information.	0.30	575.00	172.50
01/21/20	JA	Review Motion to Strike and Exclude [DE 1869] (.2); review Reply [DE 1870] (.1)	0.30	575.00	172.50
01/22/20	JHG	Review email from Alex Bongartz regarding litigation issues.	0.80	765.00	612.00
01/22/20	JHG	Review ECF 10223, notice of filing revised order and proposed orders regarding objection to bondholders.	0.30	765.00	229.50
01/22/20	JHG	Review ECF 10243, urgent motion regarding tolling of claims.	0.50	765.00	382.50
01/22/20	JHG	Review proposed committee issues regarding litigation matters raised.	0.90	765.00	688.50
01/22/20	JHG	Review email from Prime Clerk and AAFAF's limited joinder and statement regarding lift stay motions.	0.40	765.00	306.00
01/22/20	JMS	Attention to litigation strategy regarding claim objections and leave to participate granted to commonwealth underwriter defendants.	1.60	500.00	800.00
01/22/20	JA	Strategize regarding litigation matters (.6); legal research and analysis (.4); strategize with Angelo Castaldi (.4)	1.40	575.00	805.00
01/22/20	AMC	Reviewed and analyzed stay orders filed/applicable to cases in which Genovese Joblove serves as counsel of record.	0.60	375.00	225.00
01/22/20	JNS	Conferences with Steve Stiff and Angelo Castaldi regarding Stay cases' chart and deadlines (.7); create a tracking chart of cases that are stayed and deadlines (1.1)	1.80	75.00	135.00
01/22/20	SS	Completed project for A. Castaldi and summary chart of deliverables in the adversary proceedings (3.4), reviewed dockets and Interim Orders (.6), conference with J. Sardina re: production of excel spreadsheet for project (.7)	4.70	195.00	916.50
01/23/20	JHG	Review daily summary prepared by S. Siff.	0.50	765.00	382.50
01/23/20	JHG	Review ECF 9822 order granting unopposed urgent motion.	0.30	765.00	229.50
01/23/20	JHG	Review ECF 9823, order setting hearing procedures.	0.20	765.00	153.00
01/23/20	JHG	Review ECF 9824, informative motion of UCC.	0.30	765.00	229.50
01/23/20	JHG	Review ECF 9832 regarding stay relief motions.	0.20	765.00	153.00
01/23/20	JHG	Continued review of internal memorandum regarding finality of plan releases in litigation.	2.20	765.00	1,683.00
01/23/20	JHG	Review daily summary by S. Siff.	0.50	765.00	382.50

01/23/20	JHG	Review ECF 9930, reply motion of ERS bondholders regarding motion to compel.	1.10	765.00	841.50
01/23/20	JA	Confer and strategize with JP Bado regarding Kobre Kim (.2); review legal research regarding Plan confirmation objections (.8); legal research and analysis of Plan confirmation litigation (.8); strategize with John Genovese regarding litigation plan and client recommendations (1.4); strategize with Angelo Castaldi regarding strategy-related legal research and analysis (.6)	3.80	575.00	2,185.00
01/23/20	AMC	Strategize regarding issues concerning applicable legal standards to contemplated legal strategies.	0.90	375.00	337.50
01/23/20	TG	Prepare communication to Trustpoint.One re: request for linked document(s) to SSLC_SIC_0181831; Prepare communication to JP Bado enclosing same.	0.20	120.00	24.00
01/24/20	JHG	Review email from Alex Bongartz.	0.40	765.00	306.00
01/24/20	JHG	Review ECF 10295, reply in support regarding ADR procedures.	0.80	765.00	612.00
01/24/20	JHG	Review ECF 10332, order denying 2004 examinations.	0.90	765.00	688.50
01/24/20	JHG	Review ECF 10251 objection of Assured Life Guaranty to mediation report.	1.20	765.00	918.00
01/24/20	AMC	Research of First Circuit authorities concerning factors and standards governing approval of legal standards applicable to contemplated settlements and standards of review.	3.90	375.00	1,462.50
01/25/20	AMC	Draft research memorandum regarding litigation strategy relating to settlement.	2.10	375.00	787.50
01/26/20	AMC	Draft research memorandum concerning litigation strategy regarding 9019 contested matters.	2.20	375.00	825.00
01/27/20	JHG	Review internal litigation action plan and comments regarding same.	2.20	765.00	1,683.00
01/27/20	JHG	Review daily summary prepared by S. Siff.	0.50	765.00	382.50
01/27/20	JHG	Review ECF 10228, informative motion.	0.20	765.00	153.00
01/27/20	JHG	Review ECF 10243, urgent motion regarding tolling of statute of limitations.	0.40	765.00	306.00
01/27/20	JHG	Review ECF 10249 limited response of UCC regarding case management order and briefing.	0.30	765.00	229.50
01/27/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.50	765.00	382.50
01/27/20	JHG	Review ECF 10251, regarding revenue bond complaints.	1.30	765.00	994.50
01/27/20	JHG	Review ECF 10252 committee motion in limine regarding testimony.	1.40	765.00	1,071.00

01/28/20	JHG	Review email from Alex Bongartz.	0.20	765.00	153.00
01/28/20	JHG	Review daily summary from S. Siff to identify and analyze strategic litigation issues.	0.60	765.00	459.00
01/28/20	JHG	Review revised proposed order regarding Prepa insurance proceeds.	0.40	765.00	306.00
01/28/20	JHG	Review ECF 10400 regarding Ambac's motion for relief from stay.	0.80	765.00	612.00
01/28/20	JHG	Review and consider ECF 10412 notice of appeal filed by UCC.	0.10	765.00	76.50
01/28/20	JHG	Review S. Siff daily summary to identify and analyze strategic litigation issues.	0.50	765.00	382.50
01/28/20	JHG	Review ECF 10417, order on notice procedures.	0.30	765.00	229.50
01/28/20	JHG	Review ECF 10424, response of FOMB.	1.20	765.00	918.00
01/28/20	JMS	Review issues concerning dismissal of Sculptor claims (1.8); review issues concerning plan objection and impact on litigation (1.3).	3.10	500.00	1,550.00
01/29/20	JHG	Review ECF 10437 informative motion regarding notice of supplemental and partial payment of insurance proceeds.	0.30	765.00	229.50
01/29/20	JHG	Review daily summary prepared by S. Siff to identify and analyze strategic litigation issues.	0.50	765.00	382.50
01/29/20	JHG	Review ECF 10496 order regarding relief from stay.	0.20	765.00	153.00
01/29/20	JHG	Review ECF 1882, urgent motion to seal regarding expert reports.	1.30	765.00	994.50
01/29/20	JMS	Work on development of strategic litigation plan in light of potential plan issues arising from amended plan.	2.40	500.00	1,200.00
01/29/20	JPB	Analyze Kobre and Kim documents related to communications between regarding underwriters' identification of red flags over time in anticipation of drafting memorandum for clients.	4.20	375.00	1,575.00
01/30/20	JHG	Confer and strategize with J. Arrastia regarding go forward strategy.	0.60	765.00	459.00
01/30/20	JHG	Review email from Alex Bongartz and attached regarding plan recovery with particular attention to treatment of litigation claims and distributions to general unsecured creditors.	3.90	765.00	2,983.50
01/30/20	MAF	Strategize with J. Arrastia regarding litigation strategy.	0.30	550.00	165.00
01/30/20	MGG	Confer with J. Arrastia regarding Plan analysis and potential amended claims.	0.20	575.00	115.00

01/30/20	JA	Confer and strategize with John Genovese regarding go forward strategy issues (.6); confer and strategize with Michael Friedman concerning his analysis concerning litigation strategy development (.3)	0.90	575.00	517.50
01/30/20	JA	Confer and strategize with M. Guitian regarding analysis of Plan and potential amended claims as it relates to Plan (.2); strategize with Angelo Castaldi regarding claims analysis relating to potential Plan configuration issues (.2)	0.40	575.00	230.00
01/30/20	JMS	Research disclosure statement issues relative to objection on litigation claims.	1.80	500.00	900.00
01/30/20	AMC	Strategize with J. Arrastia regarding claims analysis relating to potential Plan configuration.	0.20	375.00	75.00
01/30/20	AMC	Draft substantial analysis of pending claims, and cases statuses of claims, brought by Firm on behalf of Committee in Adv. Case Nos.: 19-00267, 19-00275, 19-00276, 19-00277, 19-00278, 19-00279, 19-0028, 19-00281, 19-00282	7.20	375.00	2,700.00
01/30/20	JNS	Meeting with Angelo Castaldi regarding Pleadings Books project. Review dockets of every case our firm works on. Select download and print all main pleadings, motions and orders.	4.20	75.00	315.00
01/31/20	JHG	Review email and order resealing the LEI report.	0.50	765.00	382.50
01/31/20	JHG	Continued review of material research regarding finality of litigation releases.	2.30	765.00	1,759.50
01/31/20	JPB	Conference with A. Castaldi to analyze pending items regarding action plan, establish timeline for completion & determine follow-on courses of action.	1.10	375.00	412.50
01/31/20	AMC	Meeting with J.P. Bado to discuss extend and value of claims against defendants in Adv. Case No. 19-280.	1.10	375.00	412.50
01/31/20	JNS	Continue work on the pleadings books project. Download and print all main pleadings, organized all printed notebooks, create identifying tabs and index.	5.50	75.00	412.50
Subtotal: B191 / General Litigation			244.80		\$125,584.50

B195 / Non-Working Travel

01/27/20	JA	Travel to San Juan for in-person committee meeting. [TRAVEL BILLED AT 50% RATE]	5.60	287.50	1,610.00
01/28/20	JA	Travel from in-person committee meeting to Miami. [TRAVEL BILLED AT 50% RATE]	4.30	287.50	1,236.25
Subtotal: B195 / Non-Working Travel			9.90		\$2,846.25

B320 / Plan and Disclosure Statement

01/13/20	MAF	Emails to and from M. Guitian re: Commonwealth Plan of Adjustment and instructions on detailed review of plan, litigation trust and impact on pending litigation.	0.20	550.00	110.00
01/14/20	JHG	Review highlights and analysis of plan of adjustment relating to an email from M. Gayo-Guitian regarding litigation claims.	2.70	765.00	2,065.50

01/21/20	MGG	Pull Commonwealth Plan of Adjustment and review areas impacting litigation handled by GJB (1.40). Pull, review and outline various adversaries and claims asserted on behalf of the Commonwealth in preparation for meeting with Angelo Castaldi. (1.30)	2.70	575.00	1,552.50
01/22/20	MGG	Telephone conference with Angelo Castaldi concerning pending litigation handled by GJB and impact of Commonwealth Plan and PREPA RSA.	0.70	575.00	402.50
01/22/20	AMC	Telephone conference with M. Guitian concerning pending litigations as compared against plan language concerning said language.	0.70	375.00	262.50
01/23/20	AMC	Substantial research concerning application of Code to proposed plan (1.8) and analyze the same against express provisions of Promesa (.6)	2.40	375.00	900.00
01/24/20	AMC	Extensive research concerning plan release issues, legal standards and strategize.	5.80	375.00	2,175.00
01/30/20	MGG	Email to John Arrastia re: plan of action and coordination with Angelo Castaldi re: review of litigation claims and impact of Plan and PREPA RSA.	0.30	575.00	172.50
01/30/20	JA	Email with M. Guitian re: plan of action and coordination with Angelo Castaldi re: review of litigation claims and impact of Plan and PREPA RSA.	0.10	575.00	57.50
Subtotal: B320 / Plan and Disclosure Statement			15.60		\$7,698.00
B420 / Restructurings					
01/14/20	MGG	Review Supreme Court decision denying petitions for certiorari filed by Assured and Ambac in their respective appeals concerning the payment of special revenues pursuant to Bankruptcy Code § 922(d) (.30)Consider impact on payment of special revenue bonds (.30).	0.60	575.00	345.00
Subtotal: B420 / Restructurings			0.60		\$345.00
Total			412.40		\$176,018.75

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	74.10	765.00	56,686.50
JA	John Arrastia	Partner	9.90	287.50	2,846.25
JMS	Jesus M Suarez	Partner	29.20	500.00	14,600.00
MAF	Michael A Friedman	Partner	.50	550.00	275.00
ALG	Alfredo L Gonzalez	Partner	27.10	565.00	15,311.50
MGG	Mariaelena Gayo-Guitian	Partner	18.00	575.00	10,350.00
JA	John Arrastia	Partner	30.30	575.00	17,422.50

IRS	Irina R Sadovnic	Associate	5.70	350.00	1,995.00
JPB	JP Bado	Associate	31.10	375.00	11,662.50
AMC	Angelo M Castaldi	Associate	33.20	375.00	12,450.00
JAF	Juan A Fernandez-Barquin	Associate	15.10	465.00	7,021.50
JNS	Jessey N Sardina	Paralegal	12.30	75.00	922.50
TG	Tricia Garcia-Montes	Paralegal	0.70	120.00	84.00
CE	Carolyn Esser	Paralegal	0.50	150.00	75.00
CBH	Colleen B Hopkins	Paralegal	0.40	195.00	78.00
SS	Steve Siff	Paralegal	115.30	195.00	22,483.50
JZ	Johana Zamora	Paralegal	9.00	195.00	1,755.00
Total			412.40		\$176,018.75

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
	Copies	813.80
01/27/2020	Airfare Miami to San Juan round trip American Airlines economy - committee meeting (12272) John Arrastia	240.00
01/29/2020	Parking at airport travel to Puerto Rico committee meeting (12272) John Arrastia	51.00
01/31/2020	Data management and hosting (12272-001) Trustpoint.One 20-01175	7,235.18
Total Costs incurrent and advanced		\$8,339.98

Current Fees and Costs **\$184,358.73**

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97219

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-001
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / Special Conflict Counsel

(Services rendered inside of Puerto Rico)

For fees for professional services for the period ending Jan 31, 2020	3,047.50
Costs incurred and advanced	322.70
Current Fees and Costs Due	3,370.20

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jan 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B150 / Meetings of Creditors					
01/28/20	JA	Attend committee meeting in-person and present on litigation topics.	5.30	575.00	3,047.50
Subtotal: B150 / Meetings of Creditors			5.30		\$3,047.50
Total			5.30		\$3,047.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JA	John Arrastia	Partner	5.30	575.00	3,047.50
Total			5.30		\$3,047.50

Costs and incurrent and advanced

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/27/2020	Hotel - Hilton Hotel - San Juan 1 night for UCC in-person presentation and meeting (12272) John Arrastia	300.00
01/28/2020	Ground Transportation Uber committee meeting to airport San Juan for UCC in-person presentation and meeting (12272-002) John Arrastia	9.41
01/28/2020	Ground Transportation uber hotel to committee meeting San Juan for UCC in-person presentation and meeting (12272) John Arrastia	13.29

Total Costs incurrent and advanced	\$322.70
Current Fees and Costs	\$3,370.20

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97220

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-002

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Jan 31, 2020

9,328.50

Costs incurred and advanced

Current Fees and Costs Due

9,328.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97220

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / PREPA Adversary - Puerto Rico Electric Power Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jan 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
01/06/20	CBH	Receipt and review of e-mail from M. Guitian regarding settlement agreement and corresponding pleadings; review of docket and begin to pull pleadings.	0.50	195.00	97.50
01/07/20	CBH	Review of docket and pull all pleadings related to 9019 motion; calendar deadlines in interim order; meeting with M. Guitian regarding same.	1.50	195.00	292.50
01/29/20	MGG	Receipt and review PREPA 1882: Magistrate's Order on the Urgent Motion to Seal (PREPA 1726) (the "Motion to Seal") filed by the Government Parties in connection with their Urgent Motion for an Order in Limine Precluding the UCC from entering Expert Report into Evidence at 9019 Hearing (PREPA 1725) (the "Motion in Limine"), and the Urgent Motion to Seal (PREPA 1745) (the "Motion to Seal Reply") filed by the Government Parties in connection with their Reply in Support of Urgent Motion for an Order in Limine Precluding the UCC from entering Expert Report into Evidence at 9019 Hearing (PREPA1744) (the "Reply in Support of the Motion in Limine") in which the Court concludes that the non-public draft of the operation and maintenance agreement to be entered into between PREPA and an operator of its transmission and distribution system constitutes confidential commercial information pursuant to Section 107(b). This document relates to the ongoing bidding and negotiation process for selecting an operator for PREPA's transmission and distribution assets. Public disclosure of the draft agreement risks disrupting the bidding and negotiation process and could potentially harm PREPA's planned Transformation. The remaining portions of the LEI Report, however, including the long term rate projections produced by PREPA, and the PREPA fiscal plan load forecast scenarios produced by Assured, do not warrant continued sealing under Section 107(b) as they do not fall within any of the enumerated exceptions to the general rule of public access to court documents. Consider impact on 9019 Hearing.	0.50	575.00	287.50

PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 97220

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01/30/20	MGG	Review PREPA 1885: Government parties' Urgent Informative Motion for Tenth Revised Order Modifying Certain Deadlines applicable to the Joint Motion of Puerto Rico Electric Power Authority and AAFAF and 9019 for Order Approving Settlements Embodied in RSA (.20). Review Deadlines and proposed extensions Consider impact on 9019 litigation.(.20).	0.40	575.00	230.00
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Subtotal: B110 / Case Administration

2.90

\$907.50

B190 / Other Contested Matters

01/07/20	MGG	Review Doc No. 1858 re: Court's Ninth Revised Order Extending and Establishing Certain Deadlines Applicable to the PREPA 9019 Motion (PREPA 1235) (.30). Consider and confirm calendaring of new deadlines (.30). Consider tasks to complete for upcoming hearing on March 31st (.60).	1.00	575.00	575.00
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01/16/20	JA	Review Memorandum Order regarding Motion to Strike and Exclude Chapos Testimony.	0.30	575.00	172.50
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01/17/20	JHG	Review and analyze email from Alex Bongartz and update of PREPA 9019 litigation.	0.40	765.00	306.00
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01/30/20	JA	Review court order regarding deadlines.	0.10	575.00	57.50
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Subtotal: B190 / Other Contested Matters

1.80

\$1,111.00

B191 / General Litigation

01/07/20	JZ	Receipt and review of Ninth Revised Order Extending and Establishing Certain Deadlines Applicable to the PREPA 9019 Motion; calendar all deadlines contained in order; circulate same; update electronic case profile.	0.90	195.00	175.50
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01/07/20	JZ	Receipt and review of Motion for Entry of an Eighth Order Extending Time to Assume or Reject Unexpired Leases of Nonresidential Real Property Under Which the Puerto Rico Public Buildings Authority is the Lessor; calendar hearing date and objection deadline; update electronic case profile.	0.40	195.00	78.00
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01/07/20	JZ	Receipt and review of Urgent Motion of the Puerto Rico Buildings Authority for an Order (1) Further Extending the Date to File Creditor Matrix and (2) Extending the Date to File Creditor List; receipt and review of Order Scheduling Briefing Schedule on same; calendar objection deadline; update electronic case profile.	0.40	195.00	78.00
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01/09/20	JMS	Attention to legal research arising from PREPA RSA and potential impairment of litigation (1.8), research issues related to legal strategy (1.9); strategize with J. Arrastia (.9)	4.60	500.00	2,300.00
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01/09/20	JA	Confer with counsel for FOMB regarding Vitol litigation (.2); analyze regarding non-stayed Vitol litigation asserted in stayed Vitol litigation (.6)	0.80	575.00	460.00
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PROMESA - Official Committee of Unsecured Creditors
12272-002
Invoice No. 97220

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01/09/20	JA	Review and strategize regarding case issues and develop ongoing litigation plan (1.2); confer and strategize with Jesus Suarez regarding litigation plan (.9)	2.10	575.00	1,207.50
01/13/20	JMS	Review developments in fuel oil case ancillary proceedings (removal action) and analyze for impact on pending litigation.	1.70	500.00	850.00
01/21/20	JNS	Review and calendar deadlines in Ninth Revised Order Extending and Establishing Certain Deadlines Applicable to the Joint Motion of Puerto Rico Electric Power Authority and AAFAF [ECF No. 1858] (.9) Create working binder of all revised orders [.5]	1.40	75.00	105.00
01/27/20	JMS	Continued attention to development of litigation strategy concerning plan impairment of litigation claims against fuel defendants etc.	2.40	500.00	1,200.00
01/29/20	JZ	Receipt and review of Government parties' Urgent Informative Motion for Tenth Revised Order Modifying Certain Deadlines relating to the PREPA 9019; circulate same; update electronic case profile.	0.40	195.00	78.00
01/30/20	JZ	Receipt and review of Order Granting Government parties' Urgent Informative Motion for Tenth Revised Order Modifying Certain Deadlines relating to the PREPA 9019; circulate same; calendar deadlines; update electronic case profile.	0.40	195.00	78.00
01/31/20	JMS	Attention to LEI report issues and PREPA 9019 litigation in support of developing plan release issues.	1.40	500.00	700.00
Subtotal: B191 / General Litigation			16.90		\$7,310.00
Total			21.60		\$9,328.50

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JHG	John H Genovese	Sr. Partner	0.40	765.00	306.00
JMS	Jesus M Suarez	Partner	10.10	500.00	5,050.00
MGG	Mariaelena Gayo-Guitian	Partner	1.90	575.00	1,092.50
JA	John Arrastia	Partner	3.30	575.00	1,897.50
JNS	Jessey N Sardina	Paralegal	1.40	75.00	105.00
CBH	Colleen B Hopkins	Paralegal	2.00	195.00	390.00
JZ	Johana Zamora	Paralegal	2.50	195.00	487.50
Total			21.60		\$9,328.50

Current Fees and Costs

\$9,328.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97221

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government - Commonwealth of Puerto Rico~~

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-003
PROMESA - Official Committee of Unsecured Creditors
PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the Government
Commonwealth of Puerto Rico

(Services rendered outside of Puerto Rico)

For fees for professional services for the period ending Jan 31, 2020	17,796.50
Costs incurred and advanced	
Current Fees and Costs Due	17,796.50

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

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Bank Name: Biscayne Bank
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Routing Number : 066015767
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Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97221

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / ERS Litigation - Employees Retirement System of the
~~Government Commonwealth of Puerto Rico~~

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jan 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B110 / Case Administration					
01/15/20	JZ	Receipt and review of Minute Entry for proceedings held before Magistrate on ERS Motions; circulate same; update electronic case profile.	0.30	195.00	58.50
Subtotal: B110 / Case Administration			0.30		\$58.50
B150 / Meetings of Creditors					
01/13/20	JA	Review communication to Committee regarding case issues and strategy.	0.10	575.00	57.50
Subtotal: B150 / Meetings of Creditors			0.10		\$57.50
B191 / General Litigation					
01/02/20	JA	Review correspondence regarding ERS discovery (multiple) (.3); review summary of multi-hour call (.2); review correspondence regarding discovery and depositions (.2); review correspondence to fiscal agent (.2)	0.90	575.00	517.50
01/02/20	IRS	Review correspondence regarding upcoming meet and confer with Jones Day counsel relating to the Bondholders' discovery responses and objections. (.5)	1.30	350.00	455.00
		Review proposed topics for 30(b)(6) depositions of ERS Bondholders and Fiscal Agent. (.3)			
		Review internal analysis regarding potential motion to compel better discovery responses from the Bondholders and Fiscal Agent. (.5)			

PROMESA - Official Committee of Unsecured Creditors
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01/02/20	JZ	Receipt and review of Order Granting Urgent Joint Motion to Vacate Administrative Expense Scheduling Order and Modify Order Regarding Stay and Mandatory Mediation With Respect to Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System; circulate same; update electronic case profile.	0.30	195.00	58.50
01/03/20	JA	Review draft Motion to Compel (.4); review correspondence and draft motion from Bondholders (.3); review correspondence from counsel (.1); review correspondence among counsel (.2); correspondence to counsel (.1); review additional production (.3); confer among counsel (.2); additional correspondence regarding discovery (.2)	1.80	575.00	1,035.00
01/03/20	IRS	Review draft motion to compel better responses to discovery from ERS Bondholders. (.5) Review correspondence between ERS Counsel regarding edits and comments to draft motion to compel. (.3) Prepare correspondence regarding GJB conflict representation and signature authority for motions to compel. (.3)	1.10	350.00	385.00
01/05/20	IRS	Review extensive correspondence regarding Tracing Analysis Expert and prepare correspondence regarding interview scheduling of proposed expert. (.4) Review correspondence between ERS counsel regarding revised deposition topics for 30(b)(6) deposition of ERS Bondholders and Fiscal Agent. (.3)	0.70	350.00	245.00
01/06/20	JA	Confer with Nick Bassett regarding ERS Ultra Vires issues (.1); review correspondence regarding Motion to Compel Ultra Vires information (.1); review correspondence from Bond Holders regarding Ultra Vires discovery (.1); review correspondence among counsel regarding ERS Ultra Vires discovery (.2)	0.50	575.00	287.50
01/06/20	IRS	Review additional correspondence from ERS Counsel regarding comments and edits to topics of examination for 30(b)(6) deposition of Bondholders and Fiscal Agent.	0.30	350.00	105.00
01/06/20	AMC	Review of data set forth on master DTC data compilation concerning transfers made to/from accounts named by adversary defendant (1.1) and attend to internal communications, and communications with counsel for co-plaintiff concerning the same (.3)	1.40	375.00	525.00
01/06/20	JZ	Receipt and review of Motion of Certain ERS Bondholders to Compel the ERS to provide Complete Answers to Interrogatories in ADV Cases 19-356, 19-357, 19-359, and 19-361; circulate same; update electronic case profile.	0.40	195.00	78.00
01/06/20	JZ	Attention to Urgent Motion of the UCC and the Government Parties to Compel Production of Documents for ERS Bondholders.	0.20	195.00	39.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 97221

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01/07/20	JA	Review correspondence regarding Sculptor discovery (.1); review proposed discovery (.1); review court order [DE 763] (.2); correspondence regarding deposition issues (.1); review correspondence regarding discovery filings (.1); additional correspondence regarding joint filings (.1); review emails regarding depositions (.1)	0.80	575.00	460.00
01/07/20	IRS	Review final deposition topics for 30(b)(6) depositions of ERS Bondholders and the Fiscal Agent. (.3)	0.70	350.00	245.00
		Review correspondence regarding hearing on Bondholders' motion to compel. (.2)			
		Prepare correspondence regarding signature authority for GJB team on draft motion regarding hearing on motion to compel. (.2)			
01/07/20	AMC	Attend to multiple communications with counsel for co-plaintiff in ERS adversary proceeding concerning DTC / transfer records	0.20	375.00	75.00
01/07/20	AMC	Prepare for and attend telephone conference with counsel for adversary defendant in ERS litigation concerning position reports	0.40	375.00	150.00
01/07/20	JZ	E-mail from J. Arrastia regarding ERS Discovery and recently filed Motions to Compel.	0.20	195.00	39.00
01/07/20	JZ	Attention to numerous omnibus objections disputing the validity of claims related to general obligation bonds issued by the Commonwealth, bonds guaranteed by the Commonwealth, or bonds issued by the PBA.	0.40	195.00	78.00
01/07/20	JZ	Receipt and review of Urgent Joint Motion Proposing Objection Deadline and Hearing Date for Motions to Compel and Quash in Adv. Cases 19-356, 19-357, 19-359 and 19-361; circulate same; update electronic case profile.	0.50	195.00	97.50
01/07/20	JZ	Receipt and review of Amended Motion For Entry Of An Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, and (C) Granting Related Relief; calendar hearing date and objection deadline; update electronic case profile.	0.40	195.00	78.00
01/08/20	MGG	Review Doc ERS 765 re: Joint Urgent Motion proposing Objection Deadline and Scheduling before Magistrate Dein on January 16, 2020 and consider impact on Discovery related matters (.30). Review ERS 766 re: The Official Committee of Retired Employees of the Commonwealth of Puerto Rico's Urgent Motion for a Protective Order Quashing the Deposition Subpoena Served on Retiree Committee's Counsel, Hector Mayol Kauffmann (.30). Consider impact on Parties' Joint Motion proposing a schedule (.20). Review ERS 767 re: Proposed Stipulation and Order for the Production and Exchange of Confidential Information in connection with litigation related to 2008 bonds and impact on adversaries handled by GJB (.30).	1.10	575.00	632.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 97221

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01/08/20	JA	Review correspondence regarding discovery (.1); review Notice of Appeal [DE 768] (.1); review strategy email regarding Fiscal Agent discovery (.2); review order (.1); review correspondence from Bondholders (.1).	0.60	575.00	345.00
01/08/20	IRS	Review filed proposed stipulation and order for the production and exchange of confidential information.	0.30	350.00	105.00
01/08/20	IRS	Review order setting briefing schedule on ERS Bondholders' Motion to Compel and prepare internal correspondence regarding attendance.	0.50	350.00	175.00
01/08/20	JZ	Receipt and review of Proposed Stipulation and Order for the Production and Exchange of Confidential Information in Adv. Cases 19-356, 19-357, 19-359, 19-361 and 19-367; circulate same; update electronic case profile.	0.50	195.00	97.50
01/08/20	JZ	Receipt and review of Order Setting Briefing Schedule on Urgent Joint Motion Proposing Objection Deadline and Hearing Date for Motions to Compel and Quash and ERS Motion To Provide Complete Answers To Interrogatories filed in Adv. Cases 19-356, 19-357, 19-359 and 19-361; circulate same; calendar deadlines; update electronic case profile.	0.50	195.00	97.50
01/09/20	JA	Review multiple email correspondence among counsel regarding ERS discovery (.3); review expert materials (.2); review inquiry of bondholder defendant in AP 359 and communications among counsel (.2)	0.70	575.00	402.50
01/09/20	IRS	Review and attend to extensive correspondence regarding service of court orders and attendance at upcoming hearings. (.4)	1.50	350.00	525.00
		Review analysis and comments regarding Spanish language expert for use in ERS Ultra Vires litigation. (.3)			
		Review amended notices of deposition for 30(b)(6) corporate representatives for ERS Bondholders and Fiscal Agent. (.5)			
		Review analysis and strategy relating to Motion to Compel Fiscal Agent to produce supplemental discovery responses and good faith conference relating to extensions of time. (.3)			
01/09/20	JZ	Receipt and review of Joint Motion to Inform Regarding Hearing Date on Discovery Motions filed in Adv. Cases 19-356, 19-357, 19-359 and 19-361; circulate same; update electronic case profile.	0.40	195.00	78.00
01/10/20	MGG	Review ERS 775 and pending Discovery Disputes scheduled for hearing on January 15th.	0.20	575.00	115.00
01/10/20	JA	Review Order Setting Hearing Date (.1); review correspondence among counsel regarding expert witnesses (.1); review correspondence regarding fiscal agent discovery (.1); review correspondence regarding bondholder discovery (.1); review depositions in Ultra Vires matters (.1)	0.50	575.00	287.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 97221

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01/10/20	IRS	Review additional correspondence and comments regarding Spanish language expert for use in Ultra Vires litigation. (.2)	0.70	350.00	245.00
		Review strategy regarding protective order in ERS clawback proceedings. (.2)			
		Review internal correspondence regarding attendance at January 15 hearing on Bondholders' motion to compel. (.3)			
01/10/20	JZ	Receipt and review of Order Granting Stipulation and Order for the Production and Exchange of Confidential Information in Adv. Cases 19-356, 19-357, 19-359, 19-361 and 19-367; circulate same; update electronic case profile.	0.40	195.00	78.00
01/13/20	MGG	Review ERS 775 and 776 re: Confidentiality Stipulation (.20) and ERS 777 re: Committee's Motion for Protective Order and Bondholders' Opposition (.10); ERS 779 re: opposition of the FOMB filed on behalf of ERS to motion to compel (.20).	0.50	575.00	287.50
01/13/20	IRS	Review deposition subpoena's in AP Nos. 19-356, 357, 359, and 361. (.5)	2.00	350.00	700.00
		Prepare correspondence regarding deposition schedule in AP Nos. 19-356, 357, 359, and 361. (.3)			
		Update GJB case-list tracking sheet with stay orders and upcoming deadlines. (1.2)			
01/13/20	JZ	Receipt and review of Order Setting Procedures for January 15th hearing filed in Adv. Cases 19-356, 19-357, 19-359 and 19-361; circulate same; calendar deadlines; update electronic case profile.	0.40	195.00	78.00
01/13/20	JZ	Review of Order Setting Hearing on the Discovery Motions in the ERS adversary cases, 19-356, 19-357, 19-359 and 19-361; circulate same; calendar hearing date; e-mails to and from J. Arrastia regarding attendance; update electronic case profile.	0.50	195.00	97.50
01/14/20	IRS	Review draft reply in support of motion to compel discovery responses from ERS Bondholders and ERS counsel's comments. (1.2)	1.70	350.00	595.00
		Review Bondholder counsel's objections to motion to compel absent agreed extensions of time. (.1)			
		Review correspondence regarding Spanish language expert recommendations and final selections. (.3)			
		Review correspondence regarding deposition scheduling. (.1)			
01/14/20	AMC	Review/attend to communications to/from counsel for interested party in Adv. Pro. 19-355.	0.30	375.00	112.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
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01/14/20	JZ	Receipt and review of Bondholder's Reply in support of their Motion of Certain ERS Bondholders to Compel the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Provide Complete Answers to Interrogatories, filed in Adv. Cases 19-356, 19-357, 19-359 and 19-361; circulate same; update electronic case profile.	0.60	195.00	117.00
01/15/20	JA	Telephonically attend hearing on ERS-related discovery motions.	1.40	575.00	805.00
01/15/20	IRS	Review correspondence regarding Spanish language expert and conference call scheduling. (.2) Review draft correspondence to the Fiscal Agent regarding January 27-30 depositions and related discovery issues. (.3) Review internal correspondence regarding ERS lien scope discovery issues. (.2)	0.70	350.00	245.00
01/15/20	AMC	Preparation for and conduct call with co-counsel regarding issues raised by opposing counsel.	0.40	375.00	150.00
01/16/20	JZ	Receipt and review of Order on Discovery Motions filed in Adv. Cases 19-356, 19-357, 19-359 and 19-361; circulate same; calendar deadline; update electronic case profile.	0.50	195.00	97.50
01/16/20	JZ	Attention to Urgent Motion for Entry of Supplemental Stipulation Between the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico Regarding the Tolling of Statute of Limitations; update electronic case profile.	0.30	195.00	58.50
01/17/20	MGG	Review dockets and update regarding ERS Litigation with respect to ultra vires and lien scope challenges following evidentiary hearing before Magistrate Judge Dein.(.30). Review Order granting in part and denying in part the two discovery motions that had been presented to her by the government parties and the Committee, on one hand, and by the ERS bondholders, on the other. (.30). Review order granting certain relief requested in ERS bondholders' motion to compel (.20). Consider next steps in litigation (.30). Cursory review of ERS Bondholders' appellate brief re; refusal to appoint 926 Trustee (.40).	1.50	575.00	862.50
01/17/20	IRS	Review proposal regarding expert Spanish language expert and scope of testimony.	0.30	350.00	105.00
01/21/20	JA	Review correspondence regarding discovery relating to Ultra Vires (.1); review correspondence regarding depositions (.1); review communications regarding expert (.1);	0.30	575.00	172.50
01/21/20	JZ	Receipt and review of Joinder to the Stipulation and Order for the Production and Exchange for Information filed by Defendant 55H, Defendant 56H in ADV 19-359; circulate same; update electronic case profile.	0.40	195.00	78.00

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 97221

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01/22/20	IRS	Review informative motion in AP 19-359 regarding consent to abide by confidentiality and protective order and requesting discovery copies. (.3)	0.60	350.00	210.00
		Review correspondence between ERS counsel regarding clawback defendants' participation in depositions. (.2)			
		Prepare internal correspondence regarding GJB-involved adversary chart. (.1)			
01/23/20	JA	Review correspondence to subpoenaed parties.	0.10	575.00	57.50
01/23/20	JMS	Work on development of litigation strategy arising from impairment of litigation claims by plan,	3.40	500.00	1,700.00
01/24/20	JA	Review correspondence regarding expert (.1); review litigation schedule (.1); review draft supplemental informative motion (.1); review discovery-related correspondence (.1); review supplemental discovery response (.1)	0.50	575.00	287.50
01/24/20	JMS	Attention to development of plan objection and related research.	1.60	500.00	800.00
01/24/20	IRS	Review internal correspondence relating to ERS adversary litigation Spanish language experts. (.2)	0.80	350.00	280.00
		Review proposed informative motions regarding notice of participation in ultra vires litigation. (.3)			
		Review proposed revised ERS litigation schedule. (.1)			
		Follow up with paralegal staff regarding finalized master adversary tracker sheet. (.2)			
01/27/20	JA	Revise draft Notice of Dismissal and confer with Angelo Castaldi.	0.10	575.00	57.50
01/27/20	IRS	Review draft proposed updated litigation schedule submitted by ERS Counsel.	0.20	350.00	70.00
01/27/20	AMC	Attend to communications to/from co-counsel with respect to 19-355.	0.20	375.00	75.00
01/27/20	JZ	Draft Notice of Dismissal of Och-Ziff Capital Management in ADV 19-00355; e-mail same to A. Castaldi for review.	0.50	195.00	97.50
01/28/20	JA	Confer with Nick Bassett regarding coordination on pending litigation.	0.10	575.00	57.50
01/29/20	JNS	Calendaring new deadlines set on the proposed revised litigation schedule.	1.10	75.00	82.50
01/30/20	JA	Review and analyze 1st Circuit opinion and consider potential impact on pending litigation issues (1.2); review and analyze specific analogous case matters (.9)	2.10	575.00	1,207.50
Subtotal: B191 / General Litigation			43.50		\$17,680.50

PROMESA - Official Committee of Unsecured Creditors
12272-003
Invoice No. 97221

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Total	43.90	\$17,796.50
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Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
JMS	Jesus M Suarez	Partner	5.00	500.00	2,500.00
MGG	Mariaelena Gayo-Guitian	Partner	3.30	575.00	1,897.50
JA	John Arrastia	Partner	10.50	575.00	6,037.50
IRS	Irina R Sadovnic	Associate	13.40	350.00	4,690.00
AMC	Angelo M Castaldi	Associate	2.90	375.00	1,087.50
JNS	Jessey N Sardina	Paralegal	1.10	75.00	82.50
JZ	Johana Zamora	Paralegal	7.70	195.00	1,501.50
Total			43.90		\$17,796.50

Current Fees and Costs

\$17,796.50

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97233

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

SUMMARY / REMITTANCE COPY

Client/Matter # 12272-004

PROMESA - Official Committee of Unsecured Creditors

PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation Authority

(Services rendered outside of Puerto Rico)

For fees for professional services
for the period ending Jan 31, 2020

690.00

Costs incurred and advanced

Current Fees and Costs Due

690.00

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com and requesting written and verbal confirmation.

Wiring and ACH Instructions:

Bank Name: Biscayne Bank
Bank Telephone: 305-447-5050
Account Name: Genovese Joblove & Battista, P.A. - Operating
Routing Number : 066015767
Account Number : 21007711

Remittance Address:

Genovese Joblove & Battista, P.A.
100 Southeast Second Street, 44th Floor
Miami, Florida 33131

For payment, please reference the invoice, client and matter number(s) being paid.
Please refer all questions to Ken Forrest @ 305-349-2312 or via email @ kforrest@gjb-law.com

Genovese Joblove & Battista, P.A.

100 Southeast Second Street, 44th Floor
Miami, Florida 33131
Telephone (305) 349-2300 Facsimile (305) 349-2310
Employer ID# 65-0518134

PROMESA - Official Committee of Unsecured Creditors

March 6, 2020
Please Refer to
Invoice Number: 97233

Attn:

GJB Tax ID No. 65-0518134

Re: PROMESA: Official Committee of Unsecured Creditors / HTA Litigation - Puerto Rico Highways & Transportation
Authority

FOR PROFESSIONAL SERVICES RENDERED
for the period ending Jan 31, 2020

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
B191 / General Litigation					
01/24/20	MGG	Review and analyze potential impact on pending litigation Doc No. 10100: FOMB's Complaint against Ambac Assurance, Assured Guaranty Corp, AGMC, National, and others objecting to Defendants' Claims and seeking related relief arising from certain HTA Bonds (.50). Review Doc No. 10102: Motion of AGC, together with Assured, Ambac, and National, for Relief from the Automatic Stay, related to the HTA Bonds, and setting of deadlines.(.30). Review Doc No. 10104: Complaint of Ambac and others related to the CCDA Bonds. (.40).	1.20	575.00	690.00
Subtotal: B191 / General Litigation			1.20		\$690.00
Total			1.20		\$690.00

Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>BillHours</u>	<u>BillRate</u>	<u>BillAmount</u>
MGG	Mariaelena Gayo-Guitian	Partner	1.20	575.00	690.00
Total			1.20		\$690.00

Current Fees and Costs

\$690.00

SCHEDULE 3

PROPOSED ORDER

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,**

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

**PROMESA
Title III**

No. 17 BK 3283-LTS

(Jointly Administered)

**ORDER GRANTING THIRD INTERIM FEE APPLICATION OF GENOVESE
JOBLOVE & BATTISTA, P.A. AS SPECIAL LITIGATION COUNSEL TO
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES
FOR PERIOD FROM OCTOBER 1, 2019 THROUGH JANUARY 31, 2020**

Upon consideration of the Third Interim Fee Application (the “Application”)² of Genovese Joblove & Battista, P.A. (“GJB”), as special litigation counsel to the Official Committee of Unsecured Creditors of all Title III Debtors (other than COFINA) (the “Committee”), for an order pursuant to sections 316 and 317 of PROMESA, section 503(b) of the Bankruptcy Code made applicable to these cases by section 301(a) of PROMESA, Bankruptcy Rule 2016, and Local Rule 2016-1, for allowance of compensation and reimbursement of expenses for the period from October

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Application.

2, 2019 through January 31, 2020, the Court hereby FINDS AND DETERMINES that (i) the Court has jurisdiction to consider the Application and the relief requested therein pursuant to section 306(a) of PROMESA; (ii) venue is proper before this Court pursuant to section 307(a) of PROMESA; (iii) due and proper notice of the Application has been provided under the particular circumstances and no other or further notice need be provided; (iv) any objections to the Application having been resolved; (v) all persons with standing having been afforded the opportunity to be heard on the Application; and after due deliberation and sufficient cause appearing therefor, it is hereby **ORDERED THAT:**

1. The Application is granted on an interim basis.
2. GJB's claim for fees and expenses for services rendered during the Application Period and reimbursement for actual and necessary expenses incurred during the Application Period are hereby allowed in the amounts of \$1,234,583.00 and \$33,296.95, respectively.
3. To the extent the amounts described in paragraph 2 hereof have not already been paid pursuant to the Interim Compensation Order, (a) the Debtors are directed to pay GJB the outstanding fees in the amount of \$1,234,583.00 which represents 100% of the fees requested within fourteen days of the date of this Order, and any such payment shall be made net of any payments made by the Debtors pursuant to the Interim Compensation Order, withholding or other applicable taxes, and (b) the Debtors are directed to reimburse GJB for its outstanding expenses in the amount of \$33,296.95, which represents 100% of the expenses requested within fourteen days of the date of this Order.
4. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation of this Order.
5. GJB is authorized and empowered to take all necessary actions to implement the

relief granted in this Order.

6. Notwithstanding the possible applicability of Bankruptcy Rules 6006(d), 7062, 9014, or otherwise, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

7. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

Dated: _____, 2020.

HON. LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE